

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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IN THE MATTER OF APPLICATIONS OF)
THE UNITED STATES OF AMERICA FOR)
SEARCH WARRANTS, ARREST WARRANTS,)
AND CRIMINAL COMPLAINTS)

CASE NO. MJ-

FILED UNDER SEAL

AFFIDAVIT OF CARL RIDEOUT

I, Carl Rideout, Special Agent with the U.S. Drug Enforcement Administration (“DEA”),
being duly sworn, depose and state as follows:

Background

1. I am a Special Agent with the DEA assigned to Massachusetts. As a Special Agent, I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.
2. I have been a Special Agent with the DEA since November 1999. I am currently assigned to the New Bedford, Massachusetts, Resident Office of the New England Field Division. I have a Bachelor of Science degree in Criminal Justice from Northeastern University. During my employment with the DEA, I have participated in numerous investigations relating to the distribution of controlled substances, including heroin, cocaine, marijuana, ecstasy, illegal prescription drugs and other substances in violation of the federal anti-drug laws. I have participated in numerous other investigations in different capacities, such as monitoring wiretapped conversations, conducting physical surveillance, executing search and arrest warrants, and employing other investigative methods. Those investigations have resulted in arrests and convictions for violations of the drug laws, the seizure of drugs and firearms, and

the forfeiture of money and property. I have received training in the field of narcotics enforcement, investigations, and apprehension of narcotics offenders from the DEA Basic Academy in Quantico, Virginia.

3. Based upon my training and experience, I am familiar with narcotics traffickers' methods of operation, including the distribution, storage, and transportation of narcotics and the collection of money that constitutes the proceeds of narcotics trafficking activities. Specifically, I am familiar with the manner in which narcotics traffickers frequently use their residences to store, hide, process, package, weigh, and distribute narcotics and the proceeds of narcotics trafficking. I know that drug dealers frequently attempt to disguise their operations and use, among other things, use addresses in which other people are the residents of record in order to hide their activities and to thwart investigative activities by law enforcement. I know based that retail level heroin traffickers need a safe, convenient place to store and prepare heroin for re-sale. For those that cannot afford a second location, that place is typically their residence. Larger retail dealers need to keep at hand cut, scales, grinders, presses, baggies, cellophane wrapping and other items to re-package the heroin for re-sale. Smaller retail dealers might not re-cut the heroin, but they still need a safe convenient place to store their product and other paraphernalia such as scales and baggies, as calls for sales come in at all hours and unpredictable times. Likewise, both larger and smaller retail dealers need a safe convenient place to store the proceeds of their heroin trafficking, and typically hold onto hundreds and thousands of dollars at a time before paying their sources. For the same reasons, this place is usually their residence. Finally, I am familiar with common street terms dealers use in connection with the business, such as "work," which means a supply of heroin; "fire," which means high quality heroin sought after by users; "garbage," which often means low quality

heroin that users don't want to purchase; "boot," which means to inject heroin, and other similar terms referenced herein. I know dealers use such code for a variety of purposes, including to disguise the nature of their communications from outsiders and law enforcement.

4. This affidavit is submitted in support of applications for criminal complaints and search warrants and limited to those purposes. Accordingly, I have not set forth each and every fact learned during the investigation, but only those facts I believe are relevant to consideration of the applications. I am the case agent in an investigation that involved the interception of wire and electronic communications of cellular telephones used by Eddyberto MEJIA-RAMOS over the course of several months. As set forth below, the investigation revealed that MEJIA-RAMOS runs a heroin trafficking operation in Taunton, MA.
5. **Complaints.** I submit there is probable cause to believe that the following people have committed the offense of conspiring to distribute and to possess with intent to distribute heroin, in violation of 21 U.S.C. § 846 and 841(a)(1):

1. EDDYBERTO MEJIA-RAMOS, a/k/a "Chi-Chi;"
2. EDWIN MONTALVO, a/k/a "Ponch," a/k/a "Ponchito;"
3. LUIS IRAOLA;
4. MARIA RAMOS;
5. ANTWUNN JONES, a/k/a "Ant;"
6. JORGE MONTALVO, a/k/a "El Duro," a/k/a "Cornelio;"
7. FNU LNU, a/k/a "Fino;"
8. KEREM MENDEZ LUZ
9. ANTHONY BURT, a/k/a "Ant with the dreds;"
10. KAYLA WENTWORTH;
11. SHAKUR RUSSELL; and
12. DARIUS JONES

I further submit that

13. JEAN WHARF

did knowingly and intentionally using a communication facility in facilitating a heroin

distribution, in violation of 21 U.S.C. § 843(b).

I submit that MEJIA-RAMOS operates a retail heroin distribution operation in Taunton; that Edwin MONTALVO, Luis IRAOLA, and Antwunn JONES are or were his closest associates and conspired with and helped him distribute the heroin; that Maria RAMOS is MEJIA-RAMOS's mother, and that she conspired with and assisted him in storing and distributing heroin and collecting money; that Jorge MONTALVO and FINO (together with MENDEZ LUZ, who is FINO's wife or girlfriend) have conspired with and supplied heroin to MEJIA-RAMOS; and that BURT, WENTWORTH, RUSSELL, and Darius JONES, have conspired with him and are customers who re-distribute some or all of the heroin MEJIA-RAMOS supplies to them. WHARF is a regular customer of MEJIA-RAMOS and Edwin MONTALVO who obtains heroin for her own personal use and for others.

6. **Search Warrants.** I further submit there is probable cause to believe that evidence of heroin distribution and conspiracy to distribute and possess with intent to distribute heroin, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as more particularly described in Attachment A, is located at and within the following premises:

- A. 187 Winthrop Street, Taunton, MA, the residence of MEJIA-RAMOS and Maria RAMOS;
- B. 1 Riverview Street, First Floor Apartment, Taunton, MA, the residence of Edwin MONTALVO;
- C. 25 Haffards Street, Apartment 2 Garden Level, Fall River, MA, the residence of Antwunn JONES;
- D. 38 Cottage Street, Bridgewater, MA, where Shakur RUSSELL resides with his mother;

- E. 5 Fruit Street, Apartment 3, Taunton, MA, the residence of Darius JONES;
- F. 408 Main Street, First Floor Apartment, Wareham, MA, the current residence of Anthony BURT and Kayla WENTWORTH;
- G. 10 Clinton Street, Apartment 2, Taunton, MA, the residence of Rob ROSE, another customer/re-distributor of MEJIA-RAMOS.

PROPERTY DESCRIPTIONS

- 7. The premises are more particularly described in the paragraphs below. A photograph of each premises is attached to each application for a search warrant supported by this affidavit.
- 8. **187 Winthrop Street, Second Floor Apartment, Taunton, MA.**, the residence of MEJIA-RAMOS and Maria RAMOS, is a three story, wooden building located on the northwest corner of Winthrop Street and Winthrop Avenue in Taunton, MA. It is a two family residence with green siding and separate entrances: a white front door entrance with the numbers “187” affixed to the left side the door; and a west side door entrance that also has the numbers “187” affixed to the left side of the door. On the left side of the building there is an external stairway leading directly to the second floor. The premises also contains in the back yard a parking area abutting Winthrop Place and a small one story shed. The Taunton Board of Assessors lists the property as a two family residence owned by a person who lives next door. I know MEJIA-RAMOS and Maria RAMOS reside in the Second Floor apartment based on CS #3’s statements to me (in which s/he stated the buys took place in the second floor apartment), and because the utilities for the second floor apartment are in the name of Maria RAMOS, and because intercepted communications and extensive surveillance, including enhanced surveillance from a pole camera installed outside the premises in the fall of 2014.

9. **1 Riverview Street, 1st Floor Apartment, Taunton, MA**, the residence of Edwin

MONTALVO, is a unit within a three-story, multi-family building located on the southeast corner of East Water Street and Riverview Street, Taunton, MA. The building has gray vinyl siding with white trim, a covered porch with white railing covering the front entranceway, and a driveway located on the left side of the building. Located on the front porch post is a red number "1" with the name "Riverview Street" inscribed on the number. The 1st Floor Apartment consists of the entire first floor and is entered through a door on the front porch. I believe MONTALVO resides here based on evidence summarized in later in this affidavit.

10. **35 Cottage Street, Bridgewater, MA**, the residence of Shakur RUSSELL and his parents, is a

single family home with yellow vinyl siding and white trim. The driveway is to the right of the home (looking from Cottage Street) and the front door faces the driveway. The number "35" is attached to the siding to the right of the front door. The home consists of two 2 story structures connected by a multiple-bay garage/walkway. I know RUSSELL resides that because, among other things, his current cell phone is subscribed to his mother Belinda Keith of 35 Cottage Street, Bridgewater, MA and because he has told police and law enforcement officers that this is his address on multiple occasions in the past year.

11. **25 Haffards Street, Apartment #2 (Garden Level), Fall River, MA.**, the residence of

Antwunn JONES, is an apartment within a three story, multi-unit apartment building on the west side of Haffards Street approximately 50 yards from Bedford Street. The building has white vinyl siding and black shutters, with the number "25" in black affixed to the east side of the building facing Haffard Street. The building contains 12 units and is entered from 2 doors, located on the north and south sides of the building. Apartment #2 is within the building. I

know this is JONES's residence based on physical and enhanced surveillance, including a court authorized tracking device used on his cellular telephone, as further described below.

12. **5 Fruit Street, Apartment 3, Taunton, MA**, the residence of Darius JONES, is an apartment within a, three story building with light yellow siding and white trim. There is a covered porch on the front right corner of the building and a front entrance door on the porch with the number "5" is affixed to the right on the door's trim. The driveway to 5 Fruit Street is located on the left, eastside of the home, where there is a small covered entryway and a side entrance door.

13. **408 Main Street, First Floor Apartment, Wareham, MA**, the current residence of Anthony BURT and Kayla WENTWORTH, is a two story wooden, residential building with blue siding and white trim. There is a covered porch in front, two large trees in the small front yard, and a driveway to the left.

14. **10 Clinton Street, Apartment 2, Taunton, MA**, the residence of Rob ROSE, another customer/re-distributor of MEJIA-RAMOS, is a large three story building with grayish white siding, white trim, and a gray front porch. It appears to consist of 6 separate apartments. There is a fire escape ladder leading from the left front third story window to the roof of the front porch. The driveway is to the right and ends at a two car garage. On the right side of the front porch is the front door, with two mailboxes affixed to the siding to the left. There is also a door on the right exiting to the driveway, with four more mailboxes visible. On July 14, 2015 TFA Champion observed that one of the mailboxes attached to the front of the building was labeled "ROSE." I believe ROSE resides at this address because, among other things, on March 14, 2015 a neighbor reported a break-in in-progress at 10 Clinton Street. Taunton police responded, determined Apartment 2 had been broken into, and recovered marijuana

from inside and just outside the apartment. Later that night, Rob ROSE called police and identified himself as the tenant of Apartment 2. He was told of the reported break in, police response, and that the suspect was not found. He was not told about the recovered marijuana. ROSE told the police he did not want to file a police report and did not want any additional investigation. ROSE was also unable or unwilling to provide a contact phone number.

SUMMARY

15. This investigation focuses on a retail heroin distribution organization Taunton, MA run by Eddyberto MEJIA-RAMOS. Wire and electronic interceptions of MEJIA-RAMOS's cellular telephone were authorized by Chief Judge Saris and conducted from January 23 to February 4, 2015; from February 24 to March 25, 2015; from April 13 to May 12, 2015; and from June 11 to July 11, 2015. On July 21, 2015, United States District Judge Nathaniel M. Gorton authorized the renewal of wire and electronic communications occurring over MEJIA-RAMOS's cell phone, 774-294-8021, referred to herein as "TT #4," and renewed interceptions commenced later that day. To date, we have intercepted thousands of communications over MEJIA-RAMOS's phones. They reveal that he is engaged in a retail heroin distribution operation in Taunton; that he has been supplied by Manuel SANQUINTIN, Oristel SOTO-PEGUERO, Jorge MONTALVO, and an unknown male from Providence, RI referred to as "FINO."

16. **The investigation is nearing its conclusion and has already resulted in two significant heroin seizures.** The intercepts revealed that MEJIA-RAMOS was initially being supplied by Manuel SANQUINTIN. **On March 16, 2015,** we followed SANQUINTIN and orchestrated his stop and arrest after he retrieved from MEJIA-RAMOS a half kilogram of heroin that MEJIA-RAMOS no longer wanted because his customers complained about its

quality. Thereafter, MEJIA-RAMOS communicated with three other potential sources of supply before settling on Oristel SOTO-PEGUERO as his main source of supply in April, May, and June, although he also obtained heroin from Jorge MONTALVO and FINO during this period. **On July 6, 2015**, SOTO-PEGUERO sent Mercedes CABRAL to deliver a kilogram of heroin to MEJIA-RAMOS. We conducted surveillance, stopped her car in route, and seized a kilogram of heroin from her. A subsequent search of the apartment she shared with SOTO-PEGUERO led to the seizure of an additional two and a half kilograms of heroin and a firearm. SANQUINTIN, CABRAL, SOTO-PEGUERO, and his associate Luis GUZMAN-ORTIZ have all been indicted federally.

17. **Present Activity.** MEJIA-RAMOS is presently being supplied by the unknown male residing in Providence known as FINO. FINO frequently sends Kerem MENDEZ LUZ, his girlfriend or wife, to meet with MEJIA-RAMOS to deliver heroin and/or collect money. MEJIA-RAMOS continues to rely on associates Edwin MONTALVO and Antwunn JONES in the day to day operation of his trafficking activity. Maria RAMOS periodically assists MEJIA-RAMOS by distributing heroin or receiving drug proceeds at 187 Winthrop Street. In late June and early July, MEJIA-RAMOS had a falling out with Luis IRAOLA, and they have not been intercepted communicating with one another since. Before that, IRAOLA was MEJIA-RAMOS's closest associate and assisted him with all aspects of the heroin operation. MEJIA-RAMOS continues to distribute heroin to his major customer/re-distributors, who include Shakur RUSSELL, Jean WHARF, Anthony BURT, and BURT's girlfriend Kayla WENTWORTH.

PROBABLE CAUSE

18. EDDYBERTO MEJIA-RAMOS, a/k/a “Chi-Chi” and 187 Winthrop Street.

MEJIA-RAMOS operates a retail heroin trafficking organization in Taunton. He has been supplied by SANQUINTIN, Jorge MONTALVO, SOTO-PEGUERO, and FINO.

MEJIA-RAMOS used TT #1, TT #2, and TT #4 from late 2014 to the present.

MEJIA-RAMOS was directly implicated in the seizures on March 16 and July 6, 2015.

During the interception periods, he was intercepted multiple times each day communicating with suppliers, associates, and/or customers. Although he would occasionally use code or vague language, the totality of the communications make it clear that MEJIA-RAMOS was talking about heroin trafficking, as he refers to brown and white, various prices and quantities consistent with heroin trafficking, customers who “boot” (inject) or snort the product, and handing out “work,” meaning heroin. With some exceptions, his residence at 187 Winthrop Street has been the center of his activities; for example, SANQUINTIN retrieved the 500 grams of heroin from 187 Winthrop Street at MEJIA-RAMOS’s direction on March 16, and SOTO-PEGUERO sent CABRAL to deliver 1 kilogram of heroin to MEJIA-RAMOS at 187 Winthrop on July 6. Although he briefly stopped using 187 Winthrop Street to receive heroin after SANQUINTIN’s arrest, he later resumed and presently conducts a great deal of his activity from that location, as demonstrated in many of the paragraphs focused on the other targets set forth below. For example, on **June 19, 2015 SOTO-PEGUERO supervised the delivery of 280 grams of heroin to MEJIA-RAMOS at 187 Winthrop Street.** In particular, **at 11:57 am**, MEJIA-RAMOS spoke to SOTO-PEGUERO and ordered heroin (MEJIA-RAMOS said he wanted “to see if you could bring something for today.”) SOTO-PEGUERO replied, “I already have everything ready there. I have 309 for you, with the usual minus/less.” They agreed to meet around 4:00. **At 4:30 pm**, MEJIA-RAMOS told

SOTO-PEGUERO to come and SOTO-PEGUERO said he would be there in an hour. *A tracking device on the Nissan Murano (217ZE2) then used by SOTO-PEGUERO and CABRAL showed that it traveled directly from the area of 632 Norwest Woods Apartments in Norwood to 187 Winthrop Street in Taunton.* **At 6:19 pm**, MEJIA-RAMOS spoke to Mercedes CABRAL, who said, "I'm on my way, where do you want me to go, to your mom's or to your cousin [meaning, I believe, Luis IRAOLA]?" MEJIA-RAMOS said to go to his mom's and park in front. "Call me when you are there that my mom is there waiting for you." *At 6:56 pm, TFA Bryan Oliveira observed CABRAL as the operator and sole occupant of the Murano.* *At 7:02 pm, TFA Brady and TFA Campion observed CABRAL arrive at 187 Winthrop Street.* **At 7:08 pm**, CABRAL called and said she was there and would knock on the door. MEJIA-RAMOS said his mom was not there, he was there, and would open the door. *Brady and Campion observed CABRAL exit the Murano and enter the front door of the residence carrying a purse. Resident Agent in Charge Daniel Simmons observed CABRAL depart 187 Winthrop Street a short time later.* **At 8:51 pm**, MEJIA-RAMOS called SOTO-PEGUERO and asked, "What did you send me?" SOTO-PEGUERO replied, "I sent you there, 280." I believe this activity shows that SOTO-PEGUERO directed and CABRAL delivered 280 grams of heroin to MEJIA-RAMOS at 187 Winthrop. Other calls revealed that she collected money from MEJIA-RAMOS for a past heroin transaction. In addition, on **June 30, 2015**, based on intercepted calls and physical surveillance, SOTO-PEGUERO delivered another quantity of heroin to MEJIA-RAMOS at 187 Winthrop Street. Finally, SOTO-PEGUERO directed CABRAL to deliver a kilogram of heroin to MEJIA-RAMOS at 187 Winthrop Street on **July 6, 2015**, but she was arrested and the heroin seized before she arrived.

19. **EDWIN MONTALVO, a/k/a “Ponch,” a/k/a “Ponchito;”** is a close associate of

MEJIA-RAMOS who, among other things, distributes heroin to and collects money from the customers of the organization, including Jean WHARF and Rob ROSE.

20. For example, on **April 22, 2015 at 11:45 a.m.**, MEJIA-RAMOS called 401-649-3504 and spoke to Rob ROSE, who said he is pretty much out of shit and wanted to grab 70, but he wants to make sure that it is good. ROSE acknowledged that he stills owed MEJIA-RAMOS on the last one. MEJIA-RAMOS said it was only 5 grams. ROSE affirmed and said that MEJIA-RAMOS gave him 75. ROSE said he definitely wanted to grab the 70 but he is at work until 2:00. MEJIA-RAMOS said he is working till 5:30, but his cousin is at the house. ROSE asked if Panchito could and MEJIA-RAMOS said yes, Panchito or Luis [MONTALVO or IRAOLA]. MEJIA-RAMOS directed ROSE to call Panchito and tell him that ROB spoke to CHI-CHI, and that CHI-CHI said that he was going to give it to ROSE. **At 12:01 p.m.**, MEJIA-RAMOS sent a text to MONTALVO at 401-365-8505 that said, “U got that sampld for rob.” **At 1:53 p.m.**, IRAOLA called and asked MEJIA-RAMOS, “Did you talk to Panchito?” MEJIA-RAMOS said, “Yeah, prepare 1 gram for him.” IRAOLA responded, “But he told me 70, he wants me to prepare 70 for him.” MEJIA-RAMOS said, “So give him the 70 then, because that is for a play.” IRAOLA said, “Yes, he told me that he has that already sold, and I told him: ‘I don’t know, let me call CHI-CHI because he supposedly was going to give that back.’” MEJIA-RAMOS confirmed to give 70 to MONTALVO. *(At 2:06 p.m., TFO Champion observed a black Scion SUV pull into the driveway of 172 Oak Street, where Luis IRAOLA then resided. At 2:18 p.m., TFO Champion observed the Scion depart 172 Oak Street and Champion and I watched as it traveled east on Oak Street towards Route 140. As the Scion passed, TFO Champion identified the driver as Esmerangely ABREA and observed an unknown male in the*

passenger seat. The surveillance team followed the Scion to 12 Chandler Avenue, a housing complex in Taunton, MA. SA Rideout observed both ABREA and a male, believed to be Edwin MONTALVO, park directly in front of 41 Chandler Ave. At 2:27 p.m., SA Rideout observed MONTALVO enter 41 Chandler Ave. TFO Campion observed the Scion drive away.). At 2:21 p.m., MEJIA-RAMOS called MONTALVO, who said that he (Luis) gave him 70 to sell it to who MEJIA-RAMOS already knows. MONTALVO said that he told him (likely referring to ROSE) that if anything, MEJIA-RAMOS is gonna swap it. MEJIA-RAMOS told MONTALVO to tell him (ROSE) that he has to give MONTALVO the 2½ that he (ROSE) owes from before. MONTALVO said that that he (ROSE) told him (MONTALVO). At 4:42 p.m., MEJIA-RAMOS called ROSE, who said that he gave the shit to somebody earlier and that it is fire. MEJIA-RAMOS asked if he gave it to Budda, and ROSE said he gave it to his best costumer and she called ROSE back and told him it is better than any shit that he has had in a while and that he needs to grab that shit, because she hadn't been that high in a long time. ROSE said he gave her like a "point three." MEJIA-RAMOS said that one of his people said that it was alright or okay - that one of his people gave it to a sniffer and the sniffer said that it wasn't all that. ROSE said that he gave it to somebody who shoots it. MEJIA-RAMOS told ROSE to give it to somebody who sniffs it and to let him know what they say about it. ROSE said that the shit smells kind of weird, that maybe they don't like the taste of it, because as soon as he opened the bag it had like a weird, strong odor. ROSE said he doesn't have a lot of people that sniff it, but he would figure that out. At 7:09 p.m., ROSE called and reported, "Yo, I gave that shit to 2 more people, one that sniffs and one that shoots it, and they said that shit it is really good. Even [the guy] upstairs that complains about everything he was like, 'no, that shit was real good, way better than the last shit.'" MEJIA-RAMOS replied, "we'll stick to

that. There is plenty of that.” I believe these calls show that MONTALVO delivered heroin to ROSE at MEJIA-RAMOS’s direction and that ROSE distributed it to customers and reported back to MEJIA-RAMOS that the quality of the heroin was good.

21. Additionally, on **July 2, 2015 at 9:11 pm**, MONTALVO (508-837-1524) called and MEJIA-RAMOS asked, “I’m looking for chavos (money), is there any chavos (money)?” MONTALVO said it would be there tomorrow and MEJIA-RAMOS complained that MONTALVO fucked the money. MONTALVO said he had it, “I got it but in ‘work,’ nigga that fucker, if Bob, nobody, the only person that calls me is Jean and Rob.” MEJIA-RAMOS said, “Fuck, if you leave people waiting.” MONTALVO replied, “No, I call them every day at 7. Jean comes at 10 to see me now.” (Call 8237). I believe MEJIA-RAMOS was calling to collect the proceeds of sales by MONTALVO of heroin obtained by MEJIA-RAMOS from his sources, in this case from SOTO-PEGUERO. I believe MONTALVO replied that he still had to collect the money from his customers who included “Jean and Rob,” who I believe refer to Jean WHARF and Rob ROSE.

22. Another example was on **July 10, 2015 at 2:23 pm**, when MEJIA-RAMOS received a call from Edwin MONTALVO (508-837-1524), who asked if he could get 20 of that. MEJIA-RAMOS said it was “in the house” and he would call when he was done eating. MONTALVO said, “I have a play in like 20 minutes.” (Call 9265). Based on my training, experience, and familiarity with this investigation, I believe in this call MONTALVO wanted 20 grams of heroin and MEJIA-RAMOS had it stashed at 187 Winthrop Street.

23. On the basis of the foregoing, I believe that MONTALVO is a close associate of MEJIA-RAMOS who delivers heroin and collects money, among other conduct in furtherance of the conspiracy.

24. There is probable cause to believe that Edwin MONTALVO resides at 1 Riverview

Street, First Floor Apartment, Taunton, MA. I believe MONTALVO resides at the Riverview premises because the cars he drives have been consistently parked at that address since we began the investigation in the fall of 2014 and we recently conducted surveillance that revealed he was present at that address. In particular, on September 11, 2014, we made a controlled buy of heroin from MONTALVO using CS #1. MONTALVO told CS #1 to meet him at the apartments on 120 Ingell Street. MONTALVO arrived accompanied by an unknown female (who CS #1 identified as MONTALVO's girlfriend), who was driving a Monte Carlo bearing MA plate 4FCF80 (the **Monte Carlo**). We ran the plate and RMV lists it to a Chrysler Sebring owned by Jennifer Souris of 7 Hern Avenue in Taunton. We also ran MONTALVO'S criminal history record and his driver's license issued in 2006, which list his address as 120 Ingell Street Apartment 211 in Taunton. I believe MONTALVO's mother lives at that address. During this same period of time, surveillance officers observed MONTALVO driving a black Alero Oldsmobile bearing Massachusetts Registration plate 2FJ239 (the **Alero**). RMV records reveal the **Alero** is registered to Shirley Greene-Royster of 1 Riverview Street. On September 19, 2014, officers in this investigation conducted a trash pull and removed the lone bag of trash outside of 1 Riverview Street. Within the trash they discovered items that included: numerous cut sandwich baggies and corner baggies similar to baggies used to package heroin for sale; a personal note addressed to "Pancho" (MONTALVO's nickname as revealed by confidential informants and confirmed by the interceptions from the Target Telephones) from "mom;" and a yellow post-it note with the name "MONTALVO, Edwin" written on it. During surveillance over the past several months, my fellow officers and I have observed MONTALVO driving in and around Taunton

in **the Alero**. During surveillance, we have also frequently verified that **the Alero** was parked during the night in the driveway at 1 Riverview Street. Because we had not physically seen MONTALVO at 1 Riverview, we conducted additional investigation on **June 25, 2015**. On that date, Taunton Patrol Officer Downing questioned residents at that address using a ruse that a 911 call had directed the police there. Ptlm. Downing advised that he spoke with Patricia LEE, who said she was the first floor tenant with her boyfriend FNU HESTER, and that they reside there with her/their son and daughter who were sleeping at the time. LEE advised that **the Alero** (2FJ239) and **the Monte Carlo** (4FCF80) parked in the driveway were controlled and owned by herself and HESTER. Ptlm Downing also confirmed that the second and third floor apartment residents had no known connection to MONTALVO. **On July 23, 2015, at 10:46 am**, MONTALVO called MEJIA-RAMOS and said he needed to come by because he needs work to get that for MEJIA-RAMOS. I believe based on my familiarity with this investigation that MONTALVO wanted to get heroin (“work”) from MEJIA-RAMOS so he could make money and pay back money he owed to MEJIA-RAMOS. **At 11:30 am**, TFO Chris Brady conducted surveillance at 1 Riverview Street and observed **the Alero** in the driveway and then, **at 11:48 am**, observed MONTALVO and an unidentified female depart the premises in **the Alero**. They proceeded to a Laundromat on 89 Winthrop Street where, **at 11:57 pm**, MONTALVO called MEJIA-RAMOS, asked if he already picked up his cousin’s clothes, and then told MEJIA-RAMOS to open the door because he is on his way there now. TFO Cudmore observed via the pole camera that MONTALVO arrived at 187 Winthrop Street shortly after. Based on the foregoing, I believe MONTALVO resides at 1 Riverview Street.

25. I further believe that MONTALVO stores evidence of heroin trafficking at his residence.

In particular, for the reasons set forth in more detail above and below, I believe that

MONTALVO needs to store heroin and money at a safe location which is typically one's residence. Moreover, the deception displayed regarding the residents of the apartment and the registered owners of the various vehicles indicate to me that the other residents of the apartment are aware of his trafficking activity, making it more likely that he feels safe storing heroin, money, and other tools of the trade at the apartment.

26. **LUIS IRAOLA**; is MEJIA-RAMOS's cousin and formerly one of his closest associates.

Until **July of 2015**, IRAOLA received and stashed heroin, prepared and packaged it for distribution, and collected and delivered money to MEJIA-RAMOS. When MEJIA-RAMOS went on vacation from **June 23 to June 30**, he left TT #4 with IRAOLA to maintain the heroin trafficking business. When MEJIA-RAMOS returned, he was disappointed that IRAOLA did not collect money and did not add minutes to the phone. They have not communicated over TT #4 since. **On July 16, 2015**, IRAOLA was arrested by the Rehoboth Police Department and charged with attempted murder and domestic violence against Keila Cruz, his former girlfriend who resides at 172 Oak Street, where IRAOLA conducted much of his heroin trafficking activity. Prior to July, however, intercepted communications and surveillance revealed IRAOLA was MEJIA-RAMOS's closest associate.

27. For example, on **April 15, 2015**, MEJIA-RAMOS coordinated a delivery of heroin from **IRAOLA to BURT, then heard the product was not good and arranged for SOTO-PEGUERO to take it back.** In particular, at **12:09 p.m.**, after earlier calls and texts with BURT and then IRAOLA (using both 1452 and 9355), TT #4 called 508-536-1452 and MEJIA-RAMOS said he would send Ant IRAOLA's number so that IRAOLA can arrange to bring Ant something and maybe pick-up some money. MEJIA-RAMOS then sent BURT (508-536-1251) IRAOLA's number 508-536-1452. MEJIA-RAMOS called IRAOLA back

and said to give Ant a 20 and that he is always at 40 which is 800. He then instructed IRAOLA to record that for himself. IRAOLA confirmed the calculations and agreed to deliver to Ant's house. Later, IRAOLA asked if 5 is 250. MEJIA-RAMOS asked for who and IRAOLA said for Georgie. MEJIA-RAMOS said 5 would be 200, because the gram is at 40 and multiplied it by 5, that gives him 200. **At 1:29 p.m.**, IRAOLA reported that he gave him 290 and that with the delivery of the 20, Ant owes 510. MEJIA-RAMOS said no, he owes 810 because the 290 was for something else. MEJIA-RAMOS told IRAOLA to put all of that money together. IRAOLA said okay and revealed that Jorgito was saying 175, and if not he will go with his other connection because he always gives it to him at that price and is now raising the price on him. MEJIA-RAMOS said he had no problem with that and didn't care. **At 4:34 p.m.**, BURT reported via text that "They aint like that food." MEJIA-RAMOS then called TEIXEIRA and asked if anyone complained and TEIXEIRA said no one had complained yet, and if it was bad they would be calling already. MEJIA-RAMOS then called MONTALVO, who reported that Jean said the "food" was so-so and didn't like it. MEJIA-RAMOS then spoke to SOTO-PEGUERO (857-498-4083) and asked what changed, the work or the cut. SOTO-PEGUERO said it was the cut and MEJIA-RAMOS said people don't like it. SOTO-PEGUERO agreed to send someone to get the stuff and asks how much MEJIA-RAMOS touched. MEJIA-RAMOS said he thought only 75. **At 9:20 p.m.**, MEJIA-RAMOS spoke to Antwunn JONES (774-627-9961) and JONES asked if he had some food. MEJIA-RAMOS said he did, but Ant with the dread's people and MONTALVO's people did not like it. **At 10:18 p.m.**, SOTO-PEGUERO called and made arrangements to come grab it. MEJIA-RAMOS he was going to "give it to my cousin" and SOTO-PEGUERO said he was sending a woman to pick it up. MEJIA-RAMOS then called MONTALVO and

told him to bring the work to MEJIA-RAMOS. MEJIA-RAMOS then called IRAOLA and said he would be right there and asked if IRAOLA had the same scale. IRAOLA said yes, the one that does not go over 100. MEJIA-RAMOS arrived at 11:00. **At 11:10 p.m.,** MEJIA-RAMOS sent a text to SOTO-PEGUERO that said, "That she goes to 172 Oak Street." SOTO-PEGUERO called back and said she was on her way. MEJIA-RAMOS said the total should be 595 and he had the rest on the street. SOTO-PEGUERO said he was bringing something really good. (Calls 313, 322, 328, 331, 343, 351, 357, 364, 365, 366, 373, 385, 388, 389). I believe these calls show that IRAOLA stored, prepared and delivered heroin for MEJIA-RAMOS, and kept records and collected money from the DTO's various customers.

28. Another good example was on **April 21, 2015 at 11:46 a.m., when** MEJIA-RAMOS called 508-536-1452 and spoke to IRAOLA about the delivery from the man (SOTO-PEGUERO). IRAOLA said he opened it because people are calling him already and that it was 263. He said he multiplied by 70 and that gave him 18410. He said that SOTO-PEGUERO told him not to give him 2000 next time, but only 800 at a time. **At 11:49 a.m.,** MEJIA-RAMOS called 857-498-4083 and asked SOTO-PEGUERO to explain what he told his cousin about the 2000. SOTO-PEGUERO said from the 2000, MEJIA-RAMOS already gave him 1000 and owes him 1000 and he told IRAOLA to give him 800. SOTO-PEGUERO said he brought 265 and the same as last time with 790. MEJIA-RAMOS asked if it was 1000 in cut and SOTO-PEGUERO said yes. They do more accounting and MEJIA-RAMOS said he owes SOTO-PEGUERO \$2800 – 1800 from before and 1000 for the cut. SOTO-PEGUERO said MEJIA-RAMOS owes 265 with the 28 for the new work. **At 11:56 a.m.,** MEJIA-RAMOS called back and told IRAOLA that he (SOTO-PEGUERO) said there was 265 and multiply by 70 for 18550. I believe this means 265 grams of heroin at \$70 per gram, meaning they owe

SOTO-PEGUERO \$18,550 for the work and 1000 for the cut. MEJIA-RAMOS then instructed IRAOLA to put 18 down and then 28, possibly meaning to mix 18 grams of heroin with 28 grams of cut. IRAOLA said he was going to walk and get 40 for the Morenito. When he is finished, MEJIA-RAMOS asked if he would prepare something for Adilson (TEIXEIRA).

At 12:00 p.m., MEJIA-RAMOS called 508-844-9686 and told TEIXEIRA that his cousin would check him out with the 75 in a little bit and that it should be better stuff. TEIXEIRA told MEJIA-RAMOS to tell his cousin to hurry up. **At 12:25 p.m.**, MEJIA-RAMOS called and IRAOLA told him the 75 was ready. IRAOLA then said that after MEJIA-RAMOS left, the connection called and asked about a little gray car with tinted windows and no plates in front. He wanted to know whether they knew the car or if it might be a detective. IRAOLA said he took care of the 40 and gave it to the guy, who gave it to someone to sample, and the people are crazy about it, so that he is most likely going to call him for 20. IRAOLA asked if 20 pesos is 0.5. MEJIA-RAMOS instructed IAROLA to give him 0.4. IRAOLA then asked what he should do with the 800 from the Moreno who bothers him and MEJIA-RAMOS said to pocket that. **At 2:33 p.m.**, GAMBOA called TT #4 and asked MEJIA-RAMOS if everything was good. MEJIA-RAMOS replied he did not know yet. **At 11:32 p.m.**, MEJIA-RAMOS called TEIXEIRA and asked how it was. TEIXEIRA said some of his dudes are mad and don't like it. The dude he had test it sniffed it and did not like it at all. MEJIA-RAMOS said to let him know tomorrow about someone who "boots" so he can tell if it is the cut.

29. **MARIA RAMOS** is MEJIA-RAMOS's mother and resides at 187 Winthrop Street in Taunton. Her criminal history includes a conviction in 1995 for heroin and cocaine distribution offenses for which she received a 9 month suspended sentence. She periodically helps MEJIA-RAMOS distribute heroin or collect money at 187 Winthrop Street. For

example, on **December 11, 2014, MEJIA-RAMOS and Maria RAMOS sold 20 grams of heroin to CS #3. At 3:15 p.m.**, CS #3 called TT #1 and I overheard s/he ask, "Can I get that twenty?" I then overheard MEJIA-RAMOS reply, "Yeah, in like an hour and a half." **At 5:27 p.m.**, CS #3 called TT #1 again, and I overheard MEJIA-RAMOS instruct CS #3 to "go to my mother's; hit me up when you're there." After a thorough search, I gave CS #3 cash totaling \$900. **At 6:00 p.m.**, CS #3 called TT #1 a third time and told MEJIA-RAMOS that CS #3 was "walking to your crib now." I then heard MEJIA-RAMOS reply, "Going to call my mom and tell her you're out back." Other agents and I then watched CS #3 walk to the rear of 187 Winthrop Street. Ten minutes later, TFO Cudmore observed CS #3 emerge from the rear of the premises and walk back to meet me. CS #3 then relinquished a clear plastic knotted bag containing what appeared to be about 20 grams of heroin. CS #3 told me that s/he met with a woman whom s/he believed to be MEJIA-RAMOS's mother and received heroin from her in exchange for \$900. Based on the telephone calls and toll records between CS #3 and MEJIA-RAMOS, surveillance observations, and the debriefing of CS #3 immediately after this transaction, I believe CS #3 called TT #1 and contacted MEJIA-RAMOS, who was out of the area at the time. I further believe that MEJIA-RAMOS then used TT #1 to contact his mother and make arrangements for her to sell 20 grams of MEJIA-RAMOS's heroin to CS #3 at their residence, and that CS #3 then completed the purchase with MEJIA-RAMOS's mother.

30. **Another example occurred on January 25, 2015, when interceptions revealed that, at the direction of MEJIA-RAMOS, Maria RAMOS delivered heroin to Shakur RUSSELL at 187 Winthrop Street. At 8:47 p.m. (Call 518), TT #1 called 774-208-6737 and spoke to RAMOS. He asked her, "Hello, Mami, do you want to see Shakur for me, or no?" She**

agreed and asked what to give him. MEJIA-RAMOS said, "It's not bagged up, but if anything, watch him - bring out the scale and have him do it out in front of you." She asked, "From the 'one' that is here?" He replied, "Okay check it, if you check where the jacket is, inside there is some 'thing.' But in the side pockets, you know, the side ones not the inside one." She asked how much he wanted and MEJIA-RAMOS said, "five, zero. If I'm not mistaken, if you put that on the scale, if I'm not mistaken, that's 100." She said, "Half?" and he said, "Yeah half but, put it on the scale and boom. You're going to do it yourself right now?" She said yes and he said, "Alright so I'm going to call him to head over there." MEJIA-RAMOS then texted Shakur RUSSELL and said, "go madukes." I believe these calls revealed that Maria RAMOS prepared and distributed to RUSSELL a quantity of heroin (likely 50 grams) at MEJIA-RAMOS's direction at 187 Winthrop Street in Taunton.

31. **Another example occurred on March 16, 2015, when she helped MEJIA-RAMOS return the 500 grams of heroin later seized from SANQUINTIN.** In particular, **On March 16, 2015 at 2:18 p.m.**, MEJIA-RAMOS called SANQUINTIN ("ALEX") (617-991-0345) and told him, "Go and get that stuff because I don't want it." I believe MEJIA-RAMOS was telling SANQUINTIN to retrieve the heroin he had previously delivered because the quality did not satisfy his customers. ALEX said okay, "You only open one package of that shit, right?" MEJIA-RAMOS confirmed, and added, "Panchito has 25 there, I had given 25 to him and he told me, 'Yo, exchange it because they don't want it at all.'" Based on this my training and experience, and subsequent events, I believe MEJIA-RAMOS conveyed to ALEX that he only opened one of the four packages of heroin and gave some of the opened package to MONTALVO. MEJIA-RAMOS then coordinated with his mother Maria RAMOS and with IRAOLA to return the product to ALEX along with "1000 pesos from Panchito

(MONTALVO).” **At 2:45 p.m.**, MEJIA-RAMOS answered a call from Maria RAMOS, who used IRAOLA’s phone. She asked, “All the stuff that is there is ALEX’s?”

MEJIA-RAMOS asked in turn, “Okay, wait, there are 3 blue things and one that is loose, right?” She said yes, and he said, “yes, that is, all of it.” (Call 3216). I believe the “3 blue things and one that is loose” referred to the heroin that ALEX retrieved. That afternoon, agents tracked and/or observed ALEX arrive and enter MEJIA-RAMOS’s residence at 187 Winthrop Street in Taunton. Agents continued surveillance as ALEX left and headed north onto Route 495. After an alert and request for assistance from federal investigators, at **3:30 p.m.**, Massachusetts State Police Trooper Jason Trout observed the Nissan speeding onto I-495 northbound from the Exit 9 on ramp in Taunton. He stopped the car, and the driver (ALEX) produced a license in the name of Rohena-Osorio. Trout ultimately discovered four bags containing what Trooper Trout believed, based on his training and experience, to be over 500 grams of heroin. Three of the bags were hidden in the ALEX’s pants and one was later recovered from the state police cruiser where ALEX was held during the stop. ALEX was arrested and finger printed and subsequently identified as Manuel Alejandro SANQUINTIN of the Dominican Republic. In addition to the suspected heroin, SANQUINTIN also possessed at the time of his arrest \$1005 in cash and two cell phones, including 617-991-0345.

32. Another example occurred on **April 13, 2015**, when MEJIA-RAMOS, IRAOLA, and SOTO-PEGUERO coordinated the exchange of heroin and cash proceeds. After they arranged to have SOTO-PEGUERO meet IRAOLA at 154 Oak Street, MEJIA-RAMOS told IRAOLA to get the money from his mother (Maria RAMOS) to give to SOTO-PEGUERO.

33. Based on the foregoing, I submit there is probable cause to believe that Maria RAMOS conspired with MEJIA-RAMOS and others to distribute and possess with intent to distribute heroin.
34. **ANTWUNN JONES, a/k/a “Ant;”** is a close associate of MEJIA-RAMOS who obtains heroin from him and resells it to others. Based on the information set forth below, I believe that JONES resides at 25 Haffards Street, Apartment #2 Garden Level, in Fall River, MA. Based on my review of the intercepted communications, I know that JONES was one of the most frequent interceptees over MEJIA-RAMOS’s phones. Although their conversations and texts often involved going out at night or taking out their off-road vehicles, they also frequently discussed their heroin business. For example, on **June 16, 2015 MEJIA-RAMOS and Antwunn JONES discussed a deal for 700 grams of heroin.** In particular, **at 2:10 pm,** MEJIA-RAMOS called Antwunn JONES (774-627-9961) and they discussed the deal for 700 with SOTO-PEGUERO and JONES’ customer “Blanquito.” JONES confirmed that he would give MEJIA-RAMOS the 600 he owed him first and then do the deal. MEJIA-RAMOS said he had to pay SOTO-PEGUERO first too. MEJIA-RAMOS asked if Blanquito was going to want to do the same deal again or was it a one off. JONES said probably. (Call 5914).
35. Likewise, on **June 19, 2015, intercepted calls and surveillance showed JONES met with MEJIA-RAMOS, probably to deliver drug proceeds.** In particular, *at 1:26 pm, TFA Glenn Cudmore, using a pole camera, observed Antwunn JONES arrive at 822 Cohannet Street, driving a gray BMW (3PR524) registered to Tina JONES.* **At 1:49 pm,** MEJIA-RAMOS called and asked if JONES had any money on him, because he needed 3 to “grab some weed.” JONES said he going to call Blanquito. MEJIA-RAMOS said he didn’t need all

that. **At 2:09 pm**, JONES said he was “about to be leaving the crib to go by white boy’s. Tell him I’ll be there in less than five minutes.” **At 2:20 pm**, *Cudmore and I observed JONES depart 822 Cohannet Street in the BMW. At 2:24 pm*, BCSO Captain Michael Nunes observed JONES arrive at 72 Wales Street. *I know based on a prior investigation and search warrant executed at this address that 72 Wales Street in Taunton is the residence of Ryan Rocha, a known heroin dealer. At 2:28 pm*, JONES said he is outside “his” house and just got off the phone with him and JONES is supposed to grab the money from his mom. JONES said he will be there in 2 minutes, that his mom is pulling in right now. **At 2:37 pm**, Nunes observed JONES depart after an interaction with an unknown female who operating a black Jeep. *The Jeep (675VY1) is registered to Evangeline ROCHA (YOB 1968) at 72 Wales Street. During this period, TFA Chris Brady observed MEJIA-RAMOS at 63 Tremont Street at 3 Brother’s Barbershop. MEJIA-RAMOS was driving a gray Acura (3PM624) registered to Briana Gearty. At 2:41 pm*, Brady observed JONES arrive at 63 Tremont. **At 2:45 pm**, JONES said he was about to pull up. *At about the same time, TFA Brian Olivera observed JONES meet with MEJIA-RAMOS. At 3:04 pm*, JONES and MEJIA-RAMOS departed in their respective vehicles. **At 3:16 pm**, JONES said he was parked at silver and MEJIA-RAMOS said to call when he takes off. **At 3:20 pm**, JONES and MEJIA-RAMOS said she probably got pulled over and JONES saw a cruiser go by. **At 3:27 pm**, MEJIA-RAMOS said “he” was gone and MEJIA-RAMOS told JONES to come through the back, but not “to come up with that little package.” JONES said he knew. **At 8:54 pm**, MEJIA-RAMOS called JONES and asked what was up. JONES asked, “You got it?” MEJIA-RAMOS asked “what you want,” and JONES said he would call him back.

MEJIA-RAMOS confirmed that JONES gave him 150 already, so that is 3. (Calls 6322, 6326, 6332, 6334, 6341, 6343-44, 6420).

36. In addition, on **July 6, 2015, at 3:36 pm**, in anticipation of the delivery by SOTO-PEGUERO, MEJIA-RAMOS called Antwunn JONES and told him he needed more money, "So as soon as you get to Taunton have that, have the money right there and I'm gonna go over there and I'm gonna call my dude." JONES said, "I got what I owe you and I'm probably gonna have like, maybe like another seven five, maybe seven five or nine." (Call 8714). After SOTO-PEGUERO was arrested, Antwunn JONES called MEJIA-RAMOS **on July 8, 2015 at 6:39 pm**, and said he had 1000 of them. MEJIA-RAMOS said, "Bro, I can't do nothing with U/I my man. My man with the, with the food. He got bag up (PH) 2 days ago. But my man got bagged, but then when you told me about that blue thing, I was gonna talk to him about it, but he is bagged up. You know what I'm saying? So I'm like, I'm just stuck." (Call 8982). I believe in this call MEJIA-RAMOS told JONES that SOTO-PEGUERO ("my man") was arrested ("bagged up").

37. Finally, on **July 11, 2015, Antwunn JONES talked to MEJIA-RAMOS about two quantities of heroin on hand**. In particular, **at 8:12 pm**, Antwunn JONES called TT #4 and spoke to MEJIA-RAMOS. JONES referred to "the one we just grabbed from your cousin" and asked, "I was making him push it. He can't make it so it doesn't break like that?" MEJIA-RAMOS advised him to "do it as hard as possible." JONES asked, "Which one we got, was that at a cheaper number than the one that you just got just now?" MEJIA-RAMOS said they were the same, "but the one I gave you now I like U/I everything, like, the way it came out a little bit more." JONES said, "when I get out there Imma call you 'cause I'm definitely gonna need that one, cause I got one person that can fuck with it." (Call 9368).

Based on my training and experience and knowledge of this investigation, I believe that they were discussing the preparation of heroin for sale, which frequently involves pressing the heroin into fingers and other shapes, often using a press like the ones recovered from SOTO-PEGUERO's apartment on July 6, 2015.

38. **JORGE MONTALVO, a/k/a "El Duro," a/k/a "Cornelio."** MONTALVO was an associate of SANQUINTIN who supplied heroin to MEJIA-RAMOS after SANQUINTIN was arrested on March 16, 2015. For example, **immediately after SANQUINTIN's arrest, Jorge MONTALVO contacted MEJIA-RAMOS and agreed to continue to supply him with heroin.** In particular, on **March 16, 2015 at 10:53 p.m.**, MEJIA-RAMOS answered a call from IRAOLA, who said "El Duro" just called, "they want to talk to you." He gave MEJIA-RAMOS the number: 857-415-7252. **At 10:57 p.m.**, MEJIA-RAMOS called 857-415-7252 and asked what was up. The unidentified male, presumably "EL DURO," said, "you're that kid right?" MEJIA-RAMOS said, "Yes, Chi Chi," and EL DURO continued, "Oh, what's up, look, this kid, you're dry, you don't have anything?" MEJIA-RAMOS said, "I don't have anything, the rest of what I had he took to fix it." I believe MEJIA-RAMOS confirmed that he was "dry" because ALEX took the rest of the heroin he had. EL DURO said, "Look loco, I'm going to confide in you, because you know the problem that happened with this kid was leaving from your place, but the way he's spoken to me about you, I know from your end you guys have no problems, you understand?" I believe EL DURO is referring to ALEX's arrest and has concluded that law enforcement is not investigating or watching MEJIA-RAMOS's house. He continued, "I'm going to talk to her so that we can get you ready, so that your shit doesn't fall apart. Well, I'll hit you up again." **At 11:12 p.m.**, EL DURO called back and asked, "What are you gonna need?" MEJIA-RAMOS answered,

“Anything. When he brings me something, he brings me at least, he brought me like 200.”

EL DURO asked how much he owed “him” and MEJIA-RAMOS said he owed him like 10 or 9. MEJIA-RAMOS said he was charging him 65, but that it needed to be good. EL DURO agreed to bring 200 with 400 added to it. I believe MEJIA-RAMOS meant that ALEX typically brought him at least 200 grams of heroin, that he owed ALEX \$9-10,000, and that he was charging \$65,000 per kilogram for good quality heroin. EL DURO said he would call from a new number tomorrow (The person we knew as EL DURO later called from TT #3.

We identified the user as “EL DURO” based on voice comparison and the content of the calls.

We later identified EL DURO as Jorge MONTALVO during a car stop described below).

MEJIA-RAMOS said he got out of work at 5, but he had a cousin around there. EL DURO asked, “The cousin from today’s mess?” MEJIA-RAMOS said no, “he does the things right, but just in case, where he was, was my mom’s house, do you understand? But I don’t want to do anything there anymore, do you understand me?” I believe that MEJIA-RAMOS did not want EL DURO or his runner to come to his mom’s house because of ALEX’s arrest, just to be sure to avoid law enforcement.

39. In March, EL DURO supplied samples of heroin and then delivered a larger supply to

MEJIA-RAMOS. In particular, on **March 17, 2015**, MEJIA-RAMOS, IRAOLA, and

Anibal MELO had a series of calls which culminated in the delivery of 30 (grams of heroin) by IRAOLA to MELO. MEJIA-RAMOS specifically asked MELO, “Let me know, cause that was a different batch. Let me know exactly what they say cause if not I’ll hit you back.”

MELO first reported his man said “it’s alright,” but later called back and said, “they all called me back, they didn’t like it. That other stuff that I got, you know, before this, they were saying that shit was fire.” MEJIA-RAMOS asked, “You wanna change it?” MELO said yes and

they made arrangements to meet. **On March 18, 2015**, EL DURO apologized because his runner delivered the wrong thing yesterday; he explained, “I never run dude, I have people that run for me.” He told MEJIA-RAMOS that he would send two different samples of 15, 5 with 10 added and MEJIA-RAMOS could choose the best. (“I’m going to grab 5 and add 10”). **On March 19, 2015**, EL DURO called arranged for his runner to meet MEJIA- RAMOS at a Taunton restaurant. About a half hour after EL DURO’s runner met MEJIA-RAMOS, MEJIA-RAMOS sent MELO a text that said “B rite dea” (meaning ‘Be right there’). A subsequent call indicated that they met at 7:30 p.m. **At 7:32 p.m.**, MEJIA-RAMOS sent MELO a text that said, “Ders a 15 and a 13 they both fire let me kno which one u want.” (‘There is a 15 and a 13 and they are both ‘fire’ [high quality heroin]. Let me know which one you want.’). **On March 20, 2015 at 10:46 a.m.**, MEJIA-RAMOS received a text from MELO that said, “Every body I gave it to last night they liked it.” In later calls, MEJIA-RAMOS asked which was better (“Ok which I betta tho dey both da same?”) and MELO responded that he hadn’t opened the other one, but they liked the harder one. **On March 20, 2015**, MEJIA-RAMOS reported to EL DURO, “He likes the one that was very hard.” EL DURO determined which one he was referring to and later, MEJIA-RAMOS ordered a 2 with 4. EL DURO said he would send a woman early. **On March 21, 2015, MEJIA-RAMOS, EL DURO, and IRAOLA arranged the delivery of 800 grams of Heroin.** In particular, on **March 21, 2015 at 1:36 p.m.**, EL DURO texted, “Look I’m going to need 800.” Based on my training and experience, and prior and subsequent interceptions, I believe that EL DURO meant that he needed to be paid for the prior delivery of the heroin sample and that he would need to pick up 800 “pesos,” which I believe meant \$800. **At 2:06 p.m.**, MEJIA-RAMOS called IRAOLA and made arrangements for him to meet “the kid with

the food.” **At 2:13 p.m.**, MEJIA-RAMOS called EL DURO, who said, “I am getting ready for you.” EL DURO said delivery would be around 4 and MEJIA-RAMOS said to call his cousin [IRAOLA] if he did not pick up because he would still be at work. EL DURO said, “so he’s going to give me your mom’s address right?” MEJIA-RAMOS agreed. **At 2:16 p.m.**, MEJIA-RAMOS called and said to IRAOLA, “I’m probably going to still be working, if he hits you up or anything, send him the stuff from the house, the address.” **At 2:45 p.m.**, MEJIA-RAMOS changed his mind and told IRAOLA to send him to the barber shop instead. After back and forth about where the exchange could take place, at **6:03 p.m.**, IRAOLA called and told MEJIA-RAMOS, “I have everything already.” **At 6:08 p.m.**, EL DURO called and they confirmed that “he took it” and that EL DURO would call later for a guy to pick up the money. **At 7:28 p.m.**, (after additional calls between MEJIA-RAMOS and IRAOLA) EL DURO called and asked “if your cousin arrived safe.” MEJIA-RAMOS said yes. Later, at **7:40 p.m.**, MEJIA-RAMOS called EL DURO to discuss prices and payment. EL DURO asked how long it would take with “that,” and MEJIA-RAMOS said to give him a week. Based on the foregoing, I believe that EL DURO arranged the delivery of several hundred grams of heroin to IRAOLA for MEJIA-RAMOS.

- 40. We identified EL DURO, the user of TT #3, as Jorge MONTALVO on May 6, 2015 after a car stop.** During intercepted communications over TT #3 during the early afternoon of May 6, 2015, EL DURO made arrangements to meet a woman using telephone number (617) 606-0282 (previously identified only as “Jennifer”) in Boston at 2:00 p.m. to deliver heroin. **At 2:07 p.m.**, EL DURO instructed Jennifer to meet him on Wales Street. **At 2:14 p.m.**, Jennifer told EL DURO that Blake was driving and she will be there in 4 minutes. As a result, TFO Christopher Brady established surveillance on Wales Street and, **at 2:16 p.m.**, he

observed Blake Tuplin and Jennifer Williams arrive on Wales Street in a black Ford Fusion, (MA reg. 1WG465). TFO Brady then observed a Hispanic male exit a red Saturn (MA reg. 3NAD50) parked on the other side of the street. The male was approximately 5'6", weighed approximately 180 lbs., had facial hair and a medium complexion, and wore a plaid shirt with jeans and sneakers. After the meeting was over, agents followed the male in the Saturn to 91 Woodbole, where he exited, entered an unknown residence, then returned to the Saturn with an unknown female. A short time later, officers conducted a traffic stop of the Saturn on Morton Street. The operator of the vehicle was identified as Jorge MONTALVO. The photo on record with the Registry of Motor Vehicles for Jorge MONTALVO matched with the person stopped. The RMV record listed his address as 37C Arthur Street, Quincy, MA. However, based on physical surveillance and electronic tracking of TT #3, I know that the user of TT #3 – who I now believe to be Jorge MONTALVO - resides at 91 Woodbole Avenue in Mattapan, MA. Later that night, EL DURO told "Lenny" that he had been pulled over by the police near Walgreens, which I know to be a drug store on Morton Avenue. Jorge MONTALVO is a Hispanic male born in 1983 and has a criminal record that includes convictions: in 2012 for distribution of heroin in South Boston District Court for which he received a continued without a finding; and in 2010 for operating after a suspended license in Chelsea District Court, for which he received a continued without a finding. He was also arraigned on March 11, 2015 in East Boston District Court and charged with operating under the influence of liquor, which is pending. According to his criminal record, he was scheduled to appear in court in connection with the case on May 6, 2015. In calls intercepted on May 6, the user of TT #3 stated he had a court date. For example, on May 6 at 12:27, TT #3 called 617-652-1586 and EL DURO told UM 1586, a/k/a "Amina," that at court they gave him another date but everything is fine.

Thus, I believe that EL DURO identifies himself as Jorge MONTALVO, though that may not be his true name.

41. Based on the foregoing, I submit there is probable cause to believe that Jorge MONTALVO conspired with MEJIA-RAMOS and other to distribute heroin.

42. **FNU LNU, a/k/a "FINO;" and 233 Sunbury Street.** Based on the intercepted communications, I know that FINO periodically supplied MEJIA-RAMOS with heroin from March to June of 2015 and in July, following the arrest of SOTO-PEGUERO, he took over as MEJIA-RAMOS's primary source of supply. He also occasionally spoke to MEJIA-RAMOS about supplying him with the "snow" or the "white stuff from above," which I believe were terms used to refer to heroin. FINO sent runners to deliver heroin and collect money from MEJIA-RAMOS, and we conducted surveillance to corroborate that the runners met with MEJIA-RAMOS or his associates.

43. For example, **on July 9, 2015 FINO made arrangements to deliver heroin to MEJIA-RAMOS at 187 Winthrop Street but MEJIA-RAMOS changed the meet spot to a car wash down the street.** In particular, **at 3:35 pm**, MEJIA-RAMOS received a call from FINO (646-280-5842). FINO mentioned that Alex will have to do some time and then asked, "if I take this 575, do you need them for the next day? Or how are you working?" MEJIA-RAMOS said, "For today, for today Fino, I have the money is for today. But you know what I'm saying? I want to make sure it's good." FINO said, "Alright, you have worked with me. I always have good work, you know that. Alright I'll call you. Give me at least like an hour because that's too much." **At 4:52 pm**, FINO called again and said, "Listen sonny, he's going to be there in around half an hour, 20 minutes, he is going straight to the old woman's house." FINO said he had something else to do so "I sent the Argentinian and my nephew."

MEJIA-RAMOS told them to park out front and “they come for the money later because I'm going to give samples so they can tell me how that is, it's going to take around hour and a half, or so.” MEJIA-RAMOS agreed to meet them at the car wash. **At 4:58 pm**, FINO gave MEJIA-RAMOS the number of the guy: 401-241-0348. FINO then talked about the Dominican Republic and said, “I bought two farms the day before yesterday, one was one million and a half and the other one a million” and sells mangoes. **At 5:00 pm**, MEJIA-RAMOS called 401-241-0348 and asked, “Tell me, where are you?” UM 0348 replied, “entering East Providence.” MEJIA-RAMOS told them to meet at the car wash. **At 5:24 pm**, MEJIA-RAMOS called again and UM 0348 said to start coming out in 10-15 minutes. **At 5:42 pm**, UM 0348 called and he was passing “Dick’s.” MEJIA-RAMOS said he was on his way. Shortly after, surveillance officers observed MEJIA-RAMOS meet with men in a car wash parking lot as they discussed. **At 5:47 pm**, MEJIA-RAMOS called FINO and indicated they met. FINO said the stuff is good and they discussed payment. **At 8:42 pm**, FINO called and asked where to send the guy, presumably for the money. MEJIA-RAMOS said, “Listen, they just called me and one was through the nose. The dude says that it’s good, the only thing that the dude said was that it has a strange flavor.” MEJIA-RAMOS then switched over to a call with RUSSELL who said the guy said it was not bad. “He said that it’s not bad, that it’s good but that it’s not better than what I had before.” They then discussed how to cut the next one and where to meet FINO’s guys.

44. The next day, **on July 10, 2015 at 11:45 am**, MEJIA-RAMOS called 646-280-5842 and spoke to FINO. They discussed prices for the snow and FINO said his cost 40 and MEJIA-RAMOS said that was expensive, that others were charging 37-38. MEJIA-RAMOS asked how much did FINO send this time and he replied 575 and MEJIA-RAMOS owes 14 for that and 1 for the

old stuff. MEJIA-RAMOS said he had 12 and to give him two hours and he would have the rest. I believe this conversation concerned the price of a kilogram of cocaine ("snow" for \$37-38,000), a prior delivery of 575 grams of heroin, and money owed by MEJIA-RAMOS to FINO. **At 3:04 pm**, MEJIA-RAMOS called FINO and asked, "Where are you?" FINO replied, "My wife is heading that way, she is going to be with one of my friends, the Argentinian." MEJIA-RAMOS said to tell her, "I'll be at my house in like 25." *Shortly after 3:40 pm*, TFO Cabral observed a white Infiniti Q56 SUV bearing Rhode Island registration plate 327039, registered to a 2004 Cadillac VIN# 1G6DM577840178642 to Kerem J MENDEZ LUZ (YOB 1979) of 65 Courtland Street, Providence, RI travelling east on Route 44. Members of the investigation had previously identified the same make and model/color Infiniti Q56 SUV bearing Louisiana temporary paper plate 13395344 parked at 233 Sunbury Street in Providence, RI. Officers followed the Infiniti to a barbershop and appliance store in Taunton and identified the driver as Kerem J. MENDEZ LUZ. **At 4:15 pm**, MENDEZ LUZ and another occupant departed in the Infiniti and drove to 187 Winthrop Street. **At 4:21 pm**, MEJIA-RAMOS received a call from 401-648-1356 and spoke to a woman later identified as Kerem MENDEZ LUZ, who said, "Chichi? This is FINO's wife, how are you?" She said she was half way to MEJIA-RAMOS's mother's house and was with her baby son and the Argentinian. MEJIA-RAMOS told her to park on the side and come up with the baby. She said she would be there in 5 minutes. **At 4:23 pm**, she called back and asked, "Chi-Chi, do you want me to come out with the kid?" MEJIA-RAMOS replied, "Yes, yes, yes, my mom is here, you know, so it looks better." **At 4:27 pm**, she said to open the door. *During the same time period*, TFA Cudmore, via the pole camera, observed the Infiniti arrive, and MENDEZ LUZ exit with a small white dog and carrying an infant car seat. TFO

Oliveira further observed MENDEZ LUZ enter the common front door of 187 Winthrop Street. At 4:35 p.m., TFO Oliveira observed MENDEZ LUZ exit the front door of 187 Winthrop Street with the small dog and infant car seat, return to the Infiniti, depart, and travel on Route 44 westbound toward Providence. (Calls 9245, 9273, 9282-84). Based on the foregoing, I believe MENDEZ LUZ, at FINO's direction, collected money from MEJIA-RAMOS at 187 Winthrop Street to pay for a prior supply of heroin. I have reviewed the records for the electricity utilities account for 233 Sunbury Street, Apartment 2, and they are listed to Kerem MENDEZ, with a phone number listed as 401-648-1356, the same number MENDEZ LUZ used to contact MEJIA-RAMOS above.

- 45. In addition, we have observed vehicles connected to FINO at 187 Winthrop Street and 233 Sunbury Street.** For example, on **March 8, 2015 at 10:55 a.m.**, MEJIA-RAMOS received a Spanish text message from FINO (401-369-6442) that said, "Chi chi good morning... I am ready for you whenever you want... let me know at what time... Alright my crazy." MEJIA-RAMOS called back **at 11:33 a.m.** and said he needed two more days because he had money out on the street. He said he had 8 out on the street, but, "They got in the house, they broke in my woman's house and they stole all of my 'chavos' (money)." They discussed who might have done it and how. FINO then said, "I have half of a chicken here for you, the one that you asked me to prepare for you, the 525. Can't you get at least 5 pesos around there? So I bring you this 500 so you can move some the following week, either way don't rush." MEJIA-RAMOS repeated that he had 8 on the street and he would call FINO after 3:00. **At 7:54 p.m.**, MEJIA-RAMOS called FINO at 617-794-7018 and asked him to come down now because he needs to get out of debt. MEJIA-RAMOS said he had 7. MEJIA-RAMOS said to put it under the pillow at the same place as last time then to come to

the restaurant to get the money. At **8:36 p.m.**, 617-794-7018 sent a text to MEJIA-RAMOS that said all set. At **9:12 p.m.**, MEJIA-RAMOS called 617-794-7018 and spoke to an unknown female who said I will see you in less than 20 minutes. At **9:39 p.m.**, FINO called using the same number and said, "I am coming down, like 2 minutes away. The food is already over there, at the, at the refuge." MEJIA-RAMOS then directed FINO to the money waiting in his car. Surveillance showed that FINO's people met to deliver heroin and collect money. In particular, on **March 8, 2015 at 9:32 p.m.**, Taunton Police Sgt. Matthew Skwarto observed a white Cadillac (RI plate 327 039, registered to a 2004 Cadillac owned by Kerem J. MENDEZ-LUZ, 65 Courtland Street, Providence, RI) and an Infiniti parked alongside 187 Winthrop Street. A then unknown female exited the Infiniti and entered the front door of the house. Moments later, Major DeGouvias observed the Infiniti depart, while the Cadillac remained parked. Meanwhile, at **9:34 p.m.**, I observed MEJIA-RAMOS standing outside of Mama King restaurant near a gray Nissan Altima (MA plate 576 WG7 – a car registered to MEJIA-RAMOS's one time girlfriend Casey Spencer). Minutes later, I observed the Infiniti arrive (RI plate 390 633 2002 Infiniti owned by Isaac SOTO-PERZ, address - 24 Woodward Street Apt. 2R, Cumberland RI 02864). The Infiniti driver engaged with MEJIA-RAMOS, entered the Altima via the front passenger's side door, and then departed the area. At about the same time, Sgt. Skwarto observed the then unknown female exit the 187 Winthrop Street house, enter the white Cadillac, and depart the area. I believe, based on the interceptions, surveillance, and subsequent investigation, that the female was MENDEZ LUZ, that she delivered 500 grams of heroin to 187 Winthrop Street, and that the Infiniti driver picked up money from MEJIA-RAMOS's Altima, likely at least \$8,000. Major DeGouvias followed both

the Cadillac and Infiniti from Taunton to Rhode Island. **At 10:21p.m.**, he observed the cars arrive and park together at 233 Sunbury Street, Providence, RI.

46. In April, I obtained a court order to install and monitor tracking devices on two of the phones used by FINO and intercepted during this investigation (401-369-6442 and 617-794-7018) and renewed them in June. The data consistently showed that the phones were located in the immediate area of 233 Sunbury Street. Based on this information and additional surveillance, I submit there is probable cause to believe that FINO and MENDEZ LUZ reside at 233 Sunbury Street, Second Floor Apartment and that FINO uses the premises to store, prepare, and distribute heroin and to store cash proceeds from the sale. In addition to my training and experience, I submit that the evidence of direct travel between Taunton and the premises in conjunction with intercepted calls reveals that the purpose of the travel is to deliver heroin and collect proceeds and that the circumstances demonstrate probable cause to believe that the premises will contain evidence of heroin trafficking.

47. **I further submit based on the foregoing that there is probable cause to believe that FINO has participated with MEJIA-RAMOS and other to distribute heroin.** I have attempted and directed numerous investigative techniques to identify FINO without success. Based on my training and experience, I know that major heroin traffickers take significant steps to conceal their identity from law enforcement. For example, the interceptions in February and March revealed only that MEJIA-RAMOS's supplier was a male referred to as "ALEX." **On January 23, 2015**, "ALEX" arrived at 187 Winthrop Street to deliver a heroin sample to MEJIA-RAMOS. He was driving a white Infiniti registered to Ramon Luis ROHENA-OSORIO, of 56 Pearl Street, apartment A, Attleboro, MA. **On March 12, 2015**, I observed ALEX on Route 93 southbound in Boston to Taunton and to 187 Winthrop Street to

meet with MEJIA-RAMOS. This time he was driving a dark grey 2009 Nissan Altima, MA plate 1NC 543, also registered to Ramon Luis ROHENA-OSARIO, 56 Pearl Street, Attleboro, MA. By that time, I knew based on a combination of interceptions and enhanced surveillance that ALEX lived at 24 Fernboro Street, apartment 3, in Roxbury. **On March 16**, he was arrested driving the Nissan with 500 grams of heroin hidden in his pants. He produced a license in the name of Rohena-Osorio, but was booked and fingerprinted and subsequently identified as Manuel SANQUINTIN of the Dominican Republic. Likewise, SOTO-PEGUERO used a false name and had false identification documents when stopped during the course of the investigation. Accordingly, another reason to search 233 Sunbury Street is to recover documents concerning the identity of FINO, as likely constitute evidence of his drug trafficking activity.

48. Based on the foregoing, I submit there is probable cause to believe not only that FINO conspired with MEJIA-RAMOS and others to distribute heroin, but also that evidence of his heroin trafficking activity will be found at 233 Sunbury Street, Second Floor Apartment, Providence, MA. In particular, I believe the foregoing shows that FINO supplies heroin to MEJIA-RAMOS on a regular basis, that he has significant quantities of heroin “on hand” for delivery, and that he uses 233 Sunbury Street as his residence and as a location to receive, store, and prepare heroin for delivery to MEJIA-RAMOS and others. Thus, I think there is probable cause to believe that the items listed in Attachment A will be found within his apartment. In particular, as with SOTO-PEGEURO, I believe it is likely that FINO stores heroin (and cocaine) and drug proceeds at his apartment and that he keeps there paraphernalia necessary to prepare and sell heroin, such as presses, baggies, and cellophane to package heroin for sale; scales to weigh it; and records to track money owed by customers and to

sources of supplies. In addition, FINO and his associates have been intercepted in communication with MEJIA-RAMOS over several different cellular telephones. I believe it is likely that some or all of those phones are located at 233 Sunbury Street and that they constitute evidence of FINO's drug trafficking activity.

49. **ANTHONY BURT, a/k/a "Ant with the dreds;" and KAYLA WENTWORTH.** During the course of the investigation, MEJIA-RAMOS was intercepted in frequent communication by call and text with three associated numbers: 774-634-7771, 508-536-1251, and 508-692-7896. The communications were consistent and quickly led me to conclude that the users, a male and a female who described themselves as boyfriend and girlfriend, were regular heroin customers or MEJIA-RAMOS who re-distributed the heroin to their own customers. Additional investigation led me to conclude that the male and female were Anthony BURT and Kayla WENTWORTH.

50. In my Affidavit dated **February 24, 2015**, I stated "(15) UM 7771 is a male and one of MEJIA-RAMOS's most frequent customers who uses 774-634-7771." Phone records showed that 774-634-7771 was subscribed to Kayla Wentworth, of 510 N Main St, Raynham, MA. 774-634-7771 was last intercepted over TT #1 on **February 2, 2015** and was not intercepted over TT #2. 508-536-1251 was first intercepted over TT #2 on **February 26, 2015** (Call 344), in a text message that said, "Ant new number." 508-536-1251 is subscribed to Kay Burt, 510 N Main St, Raynham, MA 02767. Based on various records and discussions with Taunton police officers, I know that Kay Burt is Anthony BURT's mother. During intercepted communications, the user of 508-536-1251 mentioned a girlfriend named Kayla, who appeared to be involved in his drug activity. For example, on March 13, 2015 (Call 2692), MEJIA-RAMOS called 508-536-1251 and told the male that he brought him 15. The

male started to explain and said, "But I didn't even remember that shit 'cause Kayla was like, 'Yo, we're short, you just gave him the full thing.'" A then unknown female got on the phone and explained, "The last time I went and seen you, remember? That you picked me up down the street, and then you dropped me off in front of the house, remember I text you? And I was like, Yo, it was only a 17, two. I was like, 'I even tried to recalibrate the scale and all that.' And you was like, 'Yo I just got a new scale and all that shit so I don't know.'"

51. We later confirmed that BURT was the primary user of 508-536-1251. In particular, **on May 6, 2015, at 12:02 p.m.**, TT #4 called 508-536-1251 (call 4408) and MEJIA-RAMOS asked the female (WENTWORTH), "Ant's (Anthony) already Gucci right?" WENTWORTH said, "We are ready now." MEJIA-RAMOS said he was at work now and, "Cause I'll be on break for an hour, so I'll just scoop that, you know what I am saying? Do what I gotta do real quick, and then come back to work." Based on this investigation, I know MEJIA-RAMOS uses the term "Gucci," to mean "good," often referring to a customer like BURT being ready to pay MEJIA-RAMOS what he is owed for heroin previously supplied. I believe that MEJIA-RAMOS then made arrangements to pick up the money ("scoop that") and possibly deliver additional heroin ("do what I gotta do"). **At 1:06 pm**, MEJIA-RAMOS called BURT and directed him to walk towards a cemetery located a short distance from BURT's residence of 19 Harrison Avenue, Taunton, MA. Moments later, Taunton Detective Ralph Schlageter, who knows BURT, observed him walk from the area of 19 Harrison Avenue towards the cemetery. Det. Schlageter then observed a brown Honda utilized by MEJIA-RAMOS approach BURT. Moments later, Det. Schlageter observed MEJIA-RAMOS's vehicle stop in front of 19 Harrison Ave. and at this time, observed BURT exit MEJIA-RAMOS's vehicle and proceed into 19 Harrison Ave. Both Kayla WENTWORTH and Anthony BURT were

arrested and charged in Fall River District Court on March 7, 2013 with possession with intent to distribute cocaine and conspiracy to distribute controlled substances. Both had the conspiracy charge dismissed and the cocaine charge continued without a finding. Taunton police list WENTWORTH as an associate of BURT, who is well known to them. BURT was born in 1992 and has a prior adult criminal history that includes a 2014 conviction for possession with intent to distribute heroin, for which he was sentenced to a 3 month term of imprisonment that was suspended; and a 2013 conviction for possession with intent to distribute cocaine for which he was sentenced to 59 days in custody. His criminal history lists his address as 92 Winthrop Street, 2nd floor apartment, Taunton, but I know, based on observations of Taunton police officers, that BURT resided at 19 Harrison Street, first floor apartment, Taunton, until late June, when a shooting incident caused them to move.

52. Intercepted communications reveal that BURT and WENTWORTH have been among MEJIA-RAMOS's most active and frequent regular customers. For example, on **January 23, 2015, intercepted communications revealed MEJIA-RAMOS twice bagged up and delivered quantities of heroin to Anthony BURT.** In particular, at **4:24 p.m.** (Call 14), TT #1 called 774-634-7771 and BURT said he needed one of those and MEJIA-RAMOS said he was in Norton and would be by in 30 minutes. At **7:15 p.m.**, BURT called MEJIA-RAMOS and asked, "Yo, did you make it back yet?" MEJIA-RAMOS replied, "Yeah, I'm already here. I'm over here, I'm actually bagging something up." (Call 68). I believe this meant that MEJIA-RAMOS was at his residence preparing the heroin for BURT, who said he would call back when he got onto Route 44. MEJIA-RAMOS asked, "What are you gonna look at?" BURT said, "I need one for right now, but I'm going to probably need two 'cause it's grumpy today." BURT said he would grab one now and meet MEJIA-RAMOS again later. **Call 89.**

At 9:12 p.m., BURT called back and said, “I need another one.” MEJIA-RAMOS asked if he needed the same thing and BURT said he did. **Call 172. On January 24, 2015 at 12:19 a.m.**, TT #1 received a text message from 774-634-7771 which said, “Bro u only gave me 8.2 bro.” I believe this likely means that MEJIA-RAMOS gave BURT a second package of heroin that BURT weighed and claimed was only 8.2 grams instead of the customary 10 grams.

53. On March 22, 2015 MEJIA-RAMOS and BURT discussed heroin delivery and quality.

In particular, **at 1:50-52 p.m.**, Anthony BURT (508-536-1251) texted MEJIA-RAMOS and asked to get something (“Can u drop me with sumtn”) and MEJIA-RAMOS agreed to do it. Later, MEJIA-RAMOS asked if the ‘little white guy’ was happy. BURT said he had not heard yet. MEJIA-RAMOS said to ask him if one was better than the other. (Calls 4197,4198, 4208). I believe the “sumtn” was “something,” referring to heroin and that the later call MEJIA-RAMOS was asking if a customer liked the quality of the heroin.

54. On April 13, 2015 in the afternoon, MEJIA-RAMOS arranged for IRAOLA to deliver heroin to Anthony BURT. In particular, **at 3:37 p.m.**, MEJIA-RAMOS, who was at work, texted IRAOLA (939-325-9355) to call him. Minutes later, IRAOLA replied by text [in Spanish], “Call him and tell him to come out ant.” He then followed with a question, “You called?” Less than 2 minutes later, MEJIA-RAMOS texted Anthony BURT (508-536-1251), “Ma cuyn bout b dea,” which I believe meant that my “cousin” (referring to IRAOLA) is about to arrive at BURT’s residence. **At 3:50 p.m.**, IRAOLA texted MEJIA-RAMOS, “I am here parked and nothing.” MEJIA-RAMOS replied to “hold on.” At the same time, WENTWORTH called using 508-536-1251 and told MEJIA-RAMOS to send him (IRAOLA) to the back, that “He” (BURT) is in a black car with a female, and he’s giving you eight and they owe him four. MEJIA-RAMOS asked IRAOLA by text whether it was \$800 and

IRAOLA replied it was \$700. MEJIA-RAMOS asked BURT about it by text and BURT made an excuse about his brother borrowing and that he would pay him tomorrow. **At 5:30 p.m.**, BURT said he had more bread, but needed more work. (Calls 18-21, and 27, 31-34, 41). I know that “work” is a common street term for drugs and used frequently by MEJIA-RAMOS and his associates to refer to heroin.

55. On June 15, 2015 MEJIA-RAMOS delivered 20 grams of heroin to WENTWORTH. In particular, **at 12:03 pm**, TT #4 received a text message from 508-692-7896 (Kayla WENTWORTH) that said, “DAMN.CAN I GET SOMETHING.” **At 12:06 pm**, MEJIA-RAMOS replied, “Ya gime few.” **At 12:08 pm**, WENTWORTH replied, “I.Got.some.money for.u to bro.” **At 3:02 pm**, WENTWORTH (who had complained that MEJIA-RAMOS forgot him) texted: “Oh sorry just don't want to miss this money with how fucked shit been. And it for 5 you know . . . And they paying me 300 for it need that. How long you think so I can tell them?” **At 4:21 pm**, another text said, “It 17.6 exact how it came.” **At 4:23 pm**, MEJIA-RAMOS replied, “How ijst bagd dat.” WENTWORTH immediately replied, “Hold on let Me reset it” followed by “21.7” and “Sorry it was unset” and “So It is 20 I owe u 14.”

56. On June 19, 2015 MEJIA-RAMOS made another heroin delivery to WENTWORTH. In particular, **at 5:27 pm**, TT #4 received a call from 508-692-7896 and WENTWORTH asked “anything yet?” and MEJIA-RAMOS replied, “I’m still waiting.” WENTWORTH asked “so you think he is gonna actually come this time?” MEJIA-RAMOS said, “yeah, today definitely. Once he gets here I call you.” **At 9:19 pm**, she called back and asked what was up. MEJIA-RAMOS said he would be over in 15 minutes. (this was shortly after SOTO-PEGUERO delivered a quantity of heroin to MEJIA-RAMOS). **At 10:02 pm**,

WENTWORTH sent a text message that said, "Hey not to be a pain but cuz you said s few I told my people from the cape to come on.and I got th rem driving around our here waiting."

At 10:06 pm, she sent another that said, "Omg please Anwser me chi," and another that said, "This is the second time I did this to these people there not gonna fuck with me and they're my number one people bro." **At 10:18 pm**, MEJIA-RAMOS called and said to start walking toward 44. WENTWORTH said good, because she was about to cry. (Calls 6368, 6425, 6431, 6433-34, 6440). I believe these texts show WENTWORTH obtained heroin from MEJIA-RAMOS to re-distributed to her customers from Cape Cod.

57. In late June, BURT and WENTWORTH felt they were in danger due to a murder in Taunton about which they had some knowledge; they ultimately re-located to Wareham. For example, on **June 26, 2015**, WENTWORTH discussed carrying a firearm that belonged to Anthony BURT. In particular, MEJIA-RAMOS called her to collect money and she said business was slow and things were crazy. She went on to say that, "Yesterday niggas pull up to my house and pulled the burner out" with her son on the porch. "So I've just like been in the house like, I just walked to get a coffee, Anthony made me take the burner with me like, fucking nuts." I know "burner" is street slang for firearm. Thereafter, WENTWORTH told MEJIA-RAMOS that she and BURT left their residence in Taunton and were living in hotels. She also confided that she was having issues concerning the custody of her children. **On July 24, 2015**, I concluded that she and BURT were living with her relatives at 408 Main Street in Wareham. In particular, on **July 23, 2015**, WENTWORTH ordered up a 5 or 7 from MEJIA-RAMOS and requested he deliver it to her on the Cape. WENTWORTH said she is about to borrow money from her stepmother in order to give it to her grandmother who has her kids, but called MEJIA-RAMOS so she can take the money and see MEJIA-RAMOS instead

so she can get back to where she needs to be. WENTWORTH complained that if she did not have to pay for hotels and stuff she would be good. MEJIA-RAMOS agreed to send "K" (referring to Luis IRAOLA's former girlfriend Keila Cruz). **On July 24, 2015 at 10:32 am**, WENTWORTH and MEJIA-RAMOS agreed that Cruz will meet her at Hannaford's with heroin in 5 minutes. WENTWORTH said she needed to be back in Wareham by 11:15 to see her kids. **At 10:50 am**, surveillance officers observed WENTWORTH at Hannafords and later confirmed, as corroborated by intercepted calls between MEJIA-RAMOS and Cruz, that Cruz met WENTWORTH at 172 Oak Street in Taunton. WENTWORTH then proceeded to 408 Main Street in Wareham, where officers observed her playing with young children outside the residence. **At 12:04 p.m.**, WENTWORTH and others departed in a white Chrysler registered to Kellie Wentworth. The Chrysler dropped off a child at a nearby residence then returned to 408 Main Street. Later in the afternoon, Anthony BURT and Kellie Wentworth departed in the white Chrysler and traveled to Fall River. A May 17, 2014 Wareham police report indicated that on that date, police responded to the First Floor Apartment at 408 Main Street on report of a verbal argument and spoke with Terrick Winker who advised that Kellie Wentworth had too much to drink and would go to bed and cause no more problems. RMV records for both Kellie Wentworth and Terrick Wicker list 408 Main Street in Wareham as their mailing address, although Wicker's does not list an Apartment number and Wentworth's lists Apartment 1. On May 11, 2015 Wareham Police received a phone complaint from Kellie WENTWORTH regarding stolen property and identified her address as apartment #1. Utilities list Apartment #1 and Apartment #2 - #1 is in the name of the owner of the property and #2 is listed to a male who Wareham Police have dealt with on several occasions. On the morning of July 26, 2015, I conducted surveillance at 408 Main Street and observed, at 9:45

am, Kayla WENTWORTH sitting on the front porch in a t-shirt and looking at a cellular telephone. The Chrysler was parked in the driveway. Although it is possible that BURT and WENTWORTH are still residing in a hotel, I submit there is probable cause to believe they are staying at 408 Main Street with relatives based on the foregoing information. Based on the surveillance and intercepted calls involving guns and drugs, I submit there is probable cause to believe they are storing heroin, money, one or more firearms, and other evidence of heroin trafficking at that location.

58. Based on the foregoing, I submit there is probable cause to believe that BURT and WENTWORTH conspired with MEJIA-RAMOS and others to possess with intent to distribute and to distribute heroin.
59. **SHAKUR RUSSELL.** During the investigation, MEJIA-RAMOS communicated with a male who, like most drug dealers, changed his phone numbers over time: 774-319-4290, 774-319-2141, and 508-813-2675. The user was identified as Shakur RUSSELL and the intercepted communications and revealed he was one of MEJIA-RAMOS's most frequent customers who re-distributed the heroin to his own customers. Almost all of the scores of communications by text and calls concerned either meeting so that RUSSELL could get more heroin and/or deliver heroin proceeds or the quality of the heroin being sold.
60. **RUSSELL was identified as the user of these phones by voice identification among the phones, by statements he made that helped identify him, and based on surveillance.** RUSSELL was identified because he referred to himself, and others referred to him, as "Shakur," which is an unusual name, and because some officers participating in the investigation recognized his voice based on personal familiarity. In addition, I and other officers have conducted surveillance in and around 187 Winthrop Street when intercepted

communications revealed that RUSSELL would be meeting MEJIA-RAMOS there to obtain heroin or delivery money and observed him walking to the house. For example, on **June 16, 2015 at 2:41 pm**, MEJIA-RAMOS received a call on TT #4 from Shakur RUSSELL (774-319-2141) who said, "I probably I gonna need to see you tonight." MEJIA-RAMOS replied, "I got you" and "ready when you are." **At 7:00 pm**, after several texts, MEJIA-RAMOS texted RUSSELL to swing through ("Swing trew com walkn frm da village."). **At 7:07 pm**, *TFA Brady observed Shakur RUSSELL walking from the area of Cohannet Village toward 187 Winthrop Street, Taunton, MA.* **At 7:08 pm**, *BCSO Michael Nunes observed RUSSELL enter 187 Winthrop Street through the front door.* **At 7:16 pm**, *TFA Christian Theodore observed RUSSELL exit 187 Winthrop Street and walk four blocks west on Winthrop Street, where he entered a gray Chevy Impala.* Based on the calls and observations, I believe RUSSELL obtained heroin from MEJIA-RAMOS at 187 Winthrop. RUSSELL has pending drug and other criminal charges in Taunton District Court and prior convictions in 2014 for leaving the scene of an accident, for which he received a suspended sentence.

61. Scores of other intercepted communications revealed that RUSSELL was a frequent heroin customer of MEJIA-RAMOS. For example, **On January 25, 2015, at 3:43 p.m.**, TT #1 received a text message from 774-319-4290, the number RUSSELL was using at the time, which said, "u gunnah have better rite? cuz they callin me bitchin and some even stopped comin to me and answer my calls lmao." I believe this was a continuation of communications from RUSSELL about complaints made to RUSSELL by his heroin customers about the weak quality of the latest batch of heroin delivered to RUSSELL by MEJIA-RAMOS. MEJIA-RAMOS replied and instructed RUSSELL to call him now. RUSSELL texted, "aite

word i got bread for u if u need it.” I believe that “bread” referred to money either owed for a past heroin purchase or for a future purchase. **At 4:05 p.m.**, TT #1 received an incoming call and RUSSELL asked, “What are you getting? More?” MEJIA-RAMOS said yes and RUSSELL talked about his customers’ complaints and a competitor. RUSSELL said he was in Connecticut now, he just got out of work, and will call in about 2 hours when he gets back.

Call 495. **At 7:15 p.m.**, MEJIA-RAMOS called and asked where RUSSELL was and he replied, “I’m on my way to my crib, im gonna go grab that dough for you.” I believe “crib” is slang for residence and that this call tends to show that RUSSELL stores drug proceeds at his residence. **Call 517.** **At 8:46 p.m.**, RUSSELL sent a text message that said, “im out chea what do i do.” As set forth elsewhere, MEJIA-RAMOS then called his mother and told her to give “Shakur” 50 then sent a text message to RUSSELL that said, “go madukes.” *At approximately 8:20 p.m., TFA Christopher Brady and I observed a large white “box” truck (MA registration COMM R41144) drive to and park curbside adjacent to MEJIA-RAMOS’s residence. According to MA RMV records, this vehicle is registered to EFS Unique Truck Services, 50 Washington Street Norwalk, Connecticut. Two unknown individuals exited the passenger’s and driver’s doors. The passenger walked MEJIA-RAMOS’s residence and out of view. The driver returned to the vehicle. At 9:02 p.m. TFA Brady and I observed the passenger return to the rear of the truck and engage in conversation with the driver, who had since exited the vehicle. They departed in the truck a short time later. I noted the driver strongly resembled and likely was RUSSELL, but the conditions did not permit me to make a positive identification. I believe, however, based on all the facts and circumstances, that the individual was in fact RUSSELL.*

62. In addition, on **April 27, 2015 at 1:50 p.m.**, MEJIA-RAMOS received a text from Shakur RUSSELL (774-319-2141) that said, “yo they lovin this bro they sayin straight fire.” **At 8:08 p.m.**, MEJIA-RAMOS (after talking to FINO about the quality of the heroin FINO supplied) called RUSSELL and asked, “They like that or what?” RUSSELL said yeah and MEJIA-RAMOS asked, “What did they say about it?” RUSSELL replied, “They say it's fire.” MEJIA-RAMOS said, “Yeah, I got people bugging out.” RUSSELL said, “Yeah, they are saying like that they are tweaking and shit, like their body be shaking and shit. They like it though.” (Call 2590, 2669). Based on my training and experience and familiarity with this investigation, I know that “fire” is a common term for heroin perceived to be of especially good quality by users and the tweaking and shaking are consistent with the description of the effects of using heroin by users.

63. Another example was on **June 30, 2015 at 11:42 am**, when MEJIA-RAMOS called RUSSELL (508-813-2675) and asked him whether he was “good.” RUSSELL said he had like 15 left, so should be good in a couple hours. RUSSELL asked if he still had stuff and MEJIA-RAMOS said no, he was hoping to re-up tonight as he was just talking to his dude (referring to SOTO-PEGUERO). **At 5:23 pm**, RUSSELL said he had 1500 for MEJIA-RAMOS and was still waiting on the guy “from New Bedford.”

64. Another example was on **July 1, 2015 at 11:58 am**, when RUSSELL (508-813-2675) called MEJIA-RAMOS and said he was in Taunton. He agreed to get a ride to MEJIA-RAMOS's “spot” and MEJIA-RAMOS said, “I'll leave that ‘shit’ for you right out there on the chair.” RUSSELL sent a text at **12:13 pm** saying he would be on his way in 5 minutes and MEJIA-RAMOS confirmed (“ite”). **At 12:43 pm**, RUSSELL sent a text that said, “All set bro gdlks.” **At 4:09 pm**, MEJIA-RAMOS sent a text that said, “U got da rest?” **At 4:21 pm**,

RUSSELL replied, "Yea i forgot to put it there i got it tho." MEJIA-RAMOS confirmed and RUSSELL added, "Idk if u wana come grab it im in taunton." I believe these communications show that RUSSELL stopped by 187 Winthrop and picked up a quantity of heroin, but forgot to leave payment for a prior heroin supply. **On July 2, 2015 at 9:13 pm**, MEJIA-RAMOS called RUSSELL (508-813-2675) and asked, "You got that on you?" RUSSELL said, "What, the rest of the bread that I owe you?" MEJIA-RAMOS said, "Yeah," and RUSSELL said, "Yeah, I do, fucking, I'm almost done too, I don't know if you want, I'll probably be done by tomorrow morning." MEJIA-RAMOS said he wanted it right now and would be over in 10-15 minutes. **At 9:22 pm**, RUSSELL called back and said, "I'm about to make the move, somebody is coming to meet me, would I be able to just give you what I owe you for this one, and you'd bring me more? I'll be done right after this move. I'll have the 2, I still owe you the 250 or whatever, but I'll have 2 flat." MEJIA-RAMOS said okay, and he would be straight over.

65. More recently, on **July 9, 2015 at 6:29 pm**, MEJIA-RAMOS spoke to RUSSELL and said, "I touched down but I wanted to give you like a one (1) five (5), two (2) U/I to find out and make sure it's on point. I wanted to give you something small so you could give it to one of your people so you can let me know what he said, but I got it." They met up and **at 8:28 pm**, RUSSELL (508-813-2675) called and said, "Yeah, dude said he said it tastes funny but he said that it is, it's pretty good, that he gets fuck up and shit." RUSSELL said he gave him half and would give the other half to someone who boots it, meaning a user who injects the heroin rather than snorting it.

66. In addition, on **July 22, 2015**, RUSSELL (774-319-2141) called MEJIA-RAMOS and he was going to shower and then "head up to Taunton. Is it cool if I see you after that?" Based on

my familiarity with this investigation, I believe RUSSELL wanted to “see” MEJIA-RAMOS for the usual purpose, that is, to obtain heroin. MEJIA-RAMOS said okay and RUSSELL later communicated that he was getting a ride, was with Will, and was starting to walk to MEJIA-RAMOS, and told him to open the door. MEJIA-RAMOS said it was open. The pole camera did not provide an image of RUSSELL, but I have noted during the investigation that RUSSELL typically walks to the residence from the west, a route blocked from the view of the pole camera, which is located on Winthrop Avenue and shows the east facing side of the building. The device tracking TT #4 revealed that TT #4 was in the vicinity of 187 Winthrop at 11:20 am when MEJIA-RAMOS said the door was open. I believe that RUSSELL met MEJIA-RAMOS at 187 Winthrop Street to obtain heroin.

67. Based on the foregoing, I submit there is probable cause to believe that RUSSELL is conspiring with MEJIA-RAMOS and others to distribute and possess with intent to distribute heroin. I further submit there is probable cause to believe that RUSSELL lives at 35 Cottage Street in Bridgewater with his mother and that evidence of his trafficking activity is located there. In particular, I believe RUSSELL resides there because he told law enforcement officers he lived there in 2014 and stated that they rented the building to the left. I further believe that evidence of his trafficking activity is located there. In particular, I know based on this investigation that he keeps his cell phone with him and therefore that the phone would be at the residence when RUSSELL is. Physically connecting RUSSELL to one or more of the phone assigned numbers 774-319-4290, 774-319-2141, and 508-813-2675 would tend to show that he was the person intercepted using these phones and discussing heroin trafficking with MEJIA-RAMOS. I further believe that RUSSELL keeps money and the quantities of heroin he obtains from MEJIA-RAMOS on his person or at his residence. This inference is based on

my training and experience and common sense. RUSSELL typically obtains smaller quantities of heroin that can be carried in one's pocket and likewise delivers to MEJIA-RAMOS hundreds of dollars that he carries on his person. Dealers who sell such quantities typically store drugs in a safe place like their residence, because it is safe and unobtrusive. I know RUSSELL does not have a driver's license and has been intercepted in numerous communications with MEJIA-RAMOS talking about how he needs to find a ride to meet up with him. I know further from intercepted communications that RUSSELL has frequently told MEJIA-RAMOS that he is in Taunton at "Cam's" or with "Will." He has never stated or suggested in the intercepted communications that I have reviewed that he store money or drugs there. He did state at least once, on January 25, 2015, that he had drug proceeds at his residence ("I'm on my way to my crib, im gonna go grab that dough for you."). I don't believe there is any other location that he would feel he could safely store money or heroin.

68. **DARIUS JONES** is a black male born in 1992 who lives at 5 Fruit Street, Apt. 3, in Taunton. His criminal history includes a conviction in 2011 for possession of cocaine for which he received probation, which he subsequently violated and was sentenced to a year in jail in 2013. Based on the interceptions, I believe that JONES is a customer of MEJIA-RAMOS using cellular telephone 508-813-2641, a number which is subscribed to JONES at his residence address of 5 Fruit Street in Taunton. The identification of JONES was based not only on subscriber information, but also on voice identification by Taunton police officers familiar with JONES who also know him to be an associate of MEJIA-RAMOS. For example, **On January 23, 2015, at 6:20 p.m.**, JONES called to say he was close and asked, "could you bag me up a 2, 5 again? Like a separate." MEJIA-RAMOS replied, "Yeah, I got you." **At 6:23**

p.m., JONES sent a text that said, “here.” **At 6:25 p.m.**, JONES called and said he was outside. MEJIA-RAMOS said he would be right down. **At 6:31 p.m.**, JONES called again to complain.

69. **On January 28, 2015 at 1:49 p.m.**, ALEX, MEJIA-RAMOS’s primary heroin supplier at the time, asked, “Were you able to get the ‘shit’ you were going to get? The ‘little tickets’ you told me you were going to get?” MEJIA-RAMOS replied, “I believe I have 8,” but he was not sure because he was getting home now. ALEX said, “Go see if you can at least get me eleven pesos. Listen, you will get some ‘good shit’ so you can be ahead and not for you to stay behind.” MEJIA-RAMOS said, “I never stay behind, I am only behind when you bring me stuff that is so so so.” UM 0345 said, “What I was going to make its done already. I am just waiting for you.” I believe ALEX wanted \$11,000 but MEJIA-RAMOS said he only had \$8000. **At 6:13 p.m.**, ALEX called and MEJIA-RAMOS said, “I’m arriving at my house. I have 8, can you at least bring me something small?” ALEX replied, “Wait for me there, I’m 2 minutes away from you.” MEJIA-RAMOS then switched to a call waiting from Darius JONES, who asked, “you ain’t good yet?” MEJIA-RAMOS replied, “My man’s like two 2 minutes away.” JONES said he would hit him up soon. *At about 6:20 p.m., I observed a red Camry arrive at 187 Winthrop Street, Taunton, MA. At 6:39 p.m., I observed two unknown individuals exit 187 Winthrop Street, enter the red Camry, and depart. At 6:55 p.m.* Darius JONES (508-813-2641) called MEJIA-RAMOS, who asked, “You Gucci?” Based on the repeated context, I believe MEJIA-RAMOS uses the term “Gucci” to mean ‘do you have my money.’ JONES replied, “Yeah, I’m already done with that 5 you gave me. That shit was [U/I] little nigga.” MEJIA-RAMOS said, “I’ll be to you in 10 minutes.” (Call 1241). **At 7:18 p.m.**, MEJIA-RAMOS called and told JONES to come outside. *At about 7:01 p.m.*,

TFA Brian Cabral observed MEJIA-RAMOS exit the area of 187 Winthrop Street, Taunton, MA operating the gray Nissan Altima he frequently used. At 7:17p.m., TFA Brady and TFA Oliviera observed MEJIA-RAMOS park curbside in front of 5 Fruit Street Taunton, MA. TFA Brady observed two dark skinned males walk from 5 Fruit Street and engage with MEJIA-RAMOS. After about five minutes MEJIA-RAMOS departed the area. I believe, based on the circumstances, that MEJIA-RAMOS was delivering heroin to JONES after receiving it from SANQUINTIN.

70. **On February 24, 2015 at 5:24 p.m.,** MEJIA-RAMOS called Darius JONES, who said, "I'm gonna have to see you" today but they should meet tonight because JONES needed to "grab up some more money." JONES then asked, "you got the same stuff?" MEJIA-RAMOS replied, "No, I actually had a fucking incident. But they don't like that right?" JONES answered, "No, no! I'm saying, this stuff is good! They liked it! That's what I'm saying, this shit's straight." I believe in this call JONES ordered more heroin, but wanted to meet later in the night to collect more proceeds. He also indicated his customers liked the quality of the heroin.

71. **On March 3, 2015 at 7:15 p.m.,** MEJIA-RAMOS called Darius JONES (508-813-2641). JONES said, "I'm probably gonna grab some more in the morning." MEJIA-RAMOS said, "It's on point now. Shit's getting good." At 10:11 p.m., JONES told MEJIA-RAMOS, "I got plays right now, I only got 300 bucks but I got money, can you hear me?" Later he said it was 200 but he needed something till tomorrow. MEJIA-RAMOS said he would bring 10 right over. At 10:46 p.m., JONES sent a text that said, "u coming or nah got this person waiting." MEJIA-RAMOS called back and said he would have to see him in the morning. "I sold all the small pieces but I gotta open something up big but I don't even wanna do that right now." I

believe in these calls, JONES ordered more heroin but MEJIA-RAMOS told him to wait till tomorrow when he opened up and processed a bigger package.

72. **On April 20, 2015**, 508-536-1251 (used by customer Anthony BURT) sent texts to TT #4 that said, "They don't like this either," and "After that last shit my jack aint been ringing and the few niggas that jus hit me said this is better than the fake shit but it aint good." **At 9:24 p.m.**, TT #4 called 508-536-1452 and MEJIA-RAMOS asked IRAOLA, "Who did you sell 'that' to? From the material, who did you sell it to, to who?" IRAOLA replied that he sold 20 to the Moreno ('the usual Moreno, the one I call annoying') and 5 to Pito. MEJIA-RAMOS instructed IRAOLA, "Call Pito and ask him how that was." **At 9:27 p.m.**, MEJIA-RAMOS called 508-813-2641 and asked Darius JONES if he saw his cousin today. JONES said he did and MEJIA-RAMOS said he wanted to know what people thought about 'that.' JONES replied that that has probably been cut with too much shit and that the one from before was stronger.

73. **On April 27, 2015 at 8:32 p.m.**, MEJIA-RAMOS received texts from 508-813-2641 (Darius JONES) that said, "this shit they aint fucking wit it" and "ndeed that brown back."

74. **On July 22, 2015**, Darius JONES called MEJIA-RAMOS and they agreed to meet. MEJIA-RAMOS said his number is 30, and that each 10 is 300. JONES acknowledged and said his price is good and he was thinking about getting 20, but then said he wanted 15 instead. Later, JONES called again and said he just made a play.

75. **JEAN WHARF** is a very frequent customer of MEJIA-RAMOS and MONTALVO.

Although the intercepted communications reveal she is a heroin user, they also demonstrate that she distributes some of the heroin she receives from him to other people. She was born in 1974 and resides on South Main Street in Carver, MA. I believe WHARF is the user of 508-406-8473 because 1) she is the subscriber of the phone; 2) surveillance agents have

observed a female traveling in a yellow Ford Mustang (MA reg. 271 YJ4) to locations where she then met with MEJIA-RAMOS or one of his runners to obtain heroin, as anticipated in intercepted calls between TT #2 and 508-406-8473. The Mustang is registered to WHARF; and 3) both subscriber records and registry records list her address in Carver. The intercepted calls revealed that she is a customer of MEJIA-RAMOS, a user of heroin, and that she on occasion distributes to others or helps them obtain heroin from MEJIA-RAMOS or MONTALVO.

76. For example, on **March 9, 2015 at 7:39 p.m.**, MEJIA-RAMOS received a call from WHARF (508-406-8473) who said, "I'm picking up my friend John here so, I don't want to be stuck with him for like 2 hours until Ponch [MONTALVO] gets back. I was wondering if there was any chance at all, like wherever you are, if I could see you. I have another person that's going to be with me, you know that, John, I'm in Mansfield, I could be over there in like 15 minutes. I mean, if you could see me I would be so happy." MEJIA-RAMOS agreed to meet in an hour and WHARF ordered a 25 and a 35, one for him and one for us and "put them in separate bags."

77. WHARF frequently called throughout the interception periods. A more recent example is on **July 5, 2015 at 11:37 am**, when MEJIA-RAMOS called WHARF (508-406-8473) and asked, "how is everything been, good?" She replied, "Yeah! I've been seeing your cousin [Edwin MONTALVO] every other day. I was just brushing my teeth, I texted him, he said he wouldn't be around till 7, and I was like that's a long time. I don't know, but I'm glad that you are back. Do you wanna have breakfast?" MEJIA-RAMOS said he could meet later and they ultimately met at Hannafords. WHARF then sent MEJIA-RAMOS rambling text of

appreciation (“thank~you again for the beautiful~hanging~plant i.love.it!!!”) which I believe was a thank you for the heroin he delivered.

78. **On April 27, 2015**, WHARF (508-406-8473) called and left a voice mail saying she got sick, then a text that said, “please tell me, what is in that??? do you know??? i am very ill,” then MEJIA-RAMOS called and she said both her and him were in bed all day and her heart was pounding and she was throwing up. In the last call (2661, 7:31 p.m.), which was a 4 minute call in English, MEJIA-RAMOS referred to WHARF as “Jean.” **At 7:55 p.m.**, MEJIA-RAMOS received a call from 401-369-6442 and told FINO not to send him that crap because he doesn’t want it. FINO asked if it is strong, and MEJIA-RAMOS said it has the thing that kills people, Pheno (ph, a likely reference to Fentanyl) and that his people are complaining. FINO said he got that the day before yesterday. MEJIA-RAMOS said that whoever gave him that is adding the stuff inside, and his people know about that and they say it has them on edge and they don’t want that. MEJIA-RAMOS said he told his people it was pure but that his people told him it wasn’t, as they know the difference. MEJIA-RAMOS said that the ones who shoot it up like it, but the ones who snort it don’t, it knocks them out. FINO said that he would have to make it weaker then, as he gave that to people and they haven’t complained. MEJIA-RAMOS said maybe that is because his people might have a higher tolerance. FINO told him to just come over tomorrow to his house to change it.

79. Based on the foregoing, I submit there is probable cause to believe that WHARF knowingly and intentionally used a communication facility on March 9, 2015 to facilitate the distribution of heroin.

80. **Controlled Purchases.** In the fall of 2014, DEA conducted four controlled purchases resulting each time in the sale of between 10 and 20 grams of heroin by MEJIA-RAMOS to CS

#3. In each, CS #3 contacted MEJIA-RAMOS by telephone and DEA supervised the calls and conducted surveillance observations of the subsequent meetings. As a result, on **October 20**, MEJIA-RAMOS sold 10 grams of heroin to CS #3; on **October 29**, he sold 20 grams of heroin; on **November 19**, he sold another 20 grams of heroin; and on **December 11**, MEJIA-RAMOS and Maria RAMOS sold 20 grams of heroin to CS #3.

81. I submit that these controlled purchases, intercepted communications, and physical and enhanced surveillance and other evidence set forth herein shows: that MEJIA-RAMOS has been running a retail heroin trafficking operation in Taunton since at least 2014; that he uses 187 Winthrop Street to stash, prepare, and distribute heroin and to collect and store money representing the proceeds of heroin sales; that Edwin MONTALVO, Antwunn JONES, and Luis IRAOLA were his closest associates; that MEJIA-RAMOS and IRAOLA had a falling out in late June; that MEJIA-RAMOS has been supplied by SANQUINTIN, SOTO-PEGUERO, FINO, and Jorge MONTALVO, a/k/a “EL DURO;” that his mother Maria RAMOS sometimes assists his heroin deliveries and collection of money; that his primary customers include Anthony BURT, Kayla WENTWORTH, Jean WHARF, and Shakur RUSSELL; and that each of these customers re-distributes some or all of the heroin supplied by MEJIA-RAMOS; and that given the nature of their business, each of these customers is likely to keep heroin, money representing the proceeds of heroin trafficking, and other evidence of heroin trafficking within their residences.

82. **Firearms.** I believe that some or all of the targets of this investigation are likely to have firearms at their residences. In particular, MEJIA-RAMOS discussed in several communications with a male referred to as Fisti a possible firearm deal. For example, on February 25, 2015, Fisti told MEJIA-RAMOS he found him, ““An automatic nine hollow

point with twelve bullets and a box of bullets.” He clarified, “Hollow point, the ones that keep going,” and then made sounds like a machine gun. Later he called back and said it was no longer available. **On March 3, 2015 at 4:35 p.m.**, MEJIA-RAMOS spoke to FISTI again about a gun. FISTI asked, “Did you see the photo?” MEJIA-RAMOS said he didn’t get a chance to look at it and asked if the magazine was extended. FISTI said no.

MEJIA-RAMOS asked what kind it was and FISTI reported it was a “baby nine automatic.”

A minute later, MEJIA-RAMOS called back and said, “No I don't want that one, I have that same one.” **On March 6, 2015 at 6:18 p.m.**, MEJIA-RAMOS called FISTI and they again

discussed a possible gun purchase. FISTI said he had a guy who had a .22 or a .25.

MEJIA-RAMOS replied no, “what I want is a .40 or a .45, something Glock.” FISTI said he would talk to another guy and call later. **On March 11, 2015 at 1:50 p.m.**, MEJIA-RAMOS received a call from FISTI about purchasing a gun for \$900 from the guy. MEJIA-RAMOS said he wanted to see it first.

83. **In addition**, as set forth above, Kayla WENTWORTH told MEJIA-RAMOS on June 26, 2015 that BURT made her carry a gun.

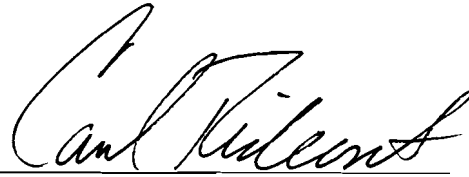
84. **Moreover, I know based on my training and experience that firearms are tools of the drug trade, especially for regular, known traffickers like MEJIA-RAMOS and his associates.** MEJIA-RAMOS and some of his associates have discussed being robbed. I know that drug traffickers are likely to keep firearms because the drug trade is dangerous, dealers cannot seek the assistance of law enforcement, and their drugs and money are valuable susceptible to robbery by other criminals. Thus, they frequently seek, obtain, carry, and store firearms. Additionally, they typically store firearms in the same safe place they store their drugs and money – their residences. For example, SOTO-PEGUERO, CABRAL, and

GUZMAN-ORTIZ stored a firearm together with their heroin at their apartment in Norwood on July 6.

85. I further know based on my training and experience and my familiarity with this investigation that heroin dealers are likely to maintain other evidence of their trafficking within their residences. For example, re-sellers typically keep packaging materials, including but not limited to baggies and cellophane or plastic wrapping in order to re-package the heroin in various quantities for sale. They also keep packaging paraphernalia, including but not limited to heroin presses to shape heroin into fingers, grinders, milling equipment, substances used to 'cut' heroin, and heat sealers that help them prepare the heroin in ways that make it more profitable. In addition, dealers frequently write down notes of heroin distributed and money owed to or from customers in order to keep track of the money they need to pay or collect. These records are often in the form of rough notes taken during telephone conversations, to detailed records of trafficking activity, including ledgers, customer lists, phone numbers, amounts of drugs delivered and money owed or collected. In addition, records or other indicia of residence, including utility bills, mail, lease records are helpful evidence to establish that the target resided at the residence where any evidence might be found. Cellular telephones are also good evidence. When an intercepted communication is offered at trial, the question is often who is the speaker. The recording equipment records the numbers of the telephones involved in the conversation. If the particular cell phone (which is very frequently subscribed in a false name or the name of a friend or relative) is found in the residence of the target, it is evidence that tends to establish the identity of the speaker as the target. Finally, drug traffickers may keep records reflecting the disposition of proceeds they earn from their drug sales, including but not limited to bank records, records of wire transfers,

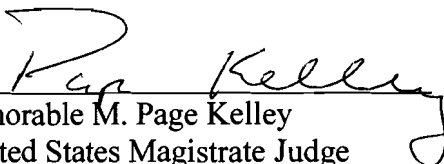
and credit card records. If these records exist, they are almost always kept at the dealer's residence.

I swear that the foregoing is true and correct to the best of my knowledge, information, and belief.



Carl Rideout
Special Agent
Drug Enforcement Administration

Sworn to before me this 27 day of July, 2015



Honorable M. Page Kelley
United States Magistrate Judge
District of Massachusetts

